



Department of
Environmental
Conservation

ESSEX CHAIN LAKES MANAGEMENT COMPLEX

Amendment

to the

2016 Essex Chain Lakes Management Complex Plan

NYS DEC, REGION 5, DIVISION OF LANDS AND FORESTS

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OFFICE OF THE COMMISSIONER

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MEMORANDUM

TO: The Record

FROM: Basil Seggos

SUBJECT: Essex Chain Lakes Management Complex Plan Amendment

The amendment to the Essex Chain Lakes Management Complex Plan has been completed and the Adirondack Park Agency has found the amendment to be in conformance to the Adirondack Park State Land Master Plan.

The amendment is consistent with Environmental Conservation Law, and Department Rules, Regulations and Policies and is hereby approved and adopted.



Basil Seggos
Commissioner
New York State Department of Environmental Conservation

Date: 1/21/21



Department of
Environmental
Conservation

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**RESOLUTION ADOPTED BY
THE ADIRONDACK PARK AGENCY
WITH RESPECT TO AN AMENDMENT TO THE ESSEX CHAIN LAKES
MANAGEMENT COMPLEX UNIT MANAGEMENT PLAN**

December 10, 2020

WHEREAS, Section 816 of the Adirondack Park Agency Act directs the Department of Environmental Conservation (DEC or Department) to develop, in consultation with the Adirondack Park Agency (APA or Agency), individual unit management plans (UMPs) for units of land classified in the Master Plan for Management of State Lands and requires such management plans to conform to the general guidelines and criteria of the Master Plan;

WHEREAS, in addition to such guidelines and criteria, the Adirondack Park State Land Master Plan prescribes the contents of unit management plans and provides that the Adirondack Park Agency will determine whether a proposed individual UMP complies with such general guidelines and criteria;

WHEREAS, the Department adopted a UMP entitled, "Essex Chain Lakes Management Complex Unit Management Plan" in March of 2016 (ECLMC UMP);

WHEREAS, the Department has prepared a proposed final Amended UMP for the Essex Chain Lakes Management Complex dated November 2020 (Proposed Final ECLMC UMP Amendment);

WHEREAS, the Department is the lead agency under SEQRA, ECL Article 8 and implementing regulations, and the Adirondack Park Agency is an involved agency whose staff have been consulted in the preparation of the Proposed Final ECLMC UMP Amendment;

WHEREAS, the Department published a Notice of Negative Declaration on December [x], 2020 in the Environmental Notice Bulletin;

WHEREAS, on July 17 the Agency provided notice of a Joint Public Comment Period until August 14, 2020 regarding the content of the Draft ECLMC UMP Amendment and any related issues of the UMP's conformance with the guidelines and criteria of the Adirondack Park State Land Master Plan (APSLMP);

WHEREAS, the Agency is requested to determine whether the Proposed Final ECLMC UMP Amendment is consistent with the guidelines and criteria of the APSLMP;

WHEREAS, the Adirondack Park Agency has reviewed the Proposed Final ECLMC UMP Amendment;

WHEREAS, the Proposed Final ECLMC UMP Amendment contains two proposals: lifting a ban on campfires at primitive tent sites in the Essex Chain Lakes

Primitive Area; and installing additional facilities at the Outer Gooley Parking Area in the Blue Mountain Wild Forest, including sanitary facilities, horse-mounting platform, hitching posts, and trailhead kiosks, and adapting a parking area to accommodate vehicles with trailers;

WHEREAS, the Proposed Final ECLMC UMP Amendment acknowledges the potential for significant impacts from campfires that may occur in the highly sensitive shoreline areas of the Essex Chain Lakes and therefore commits to a focused program to monitor potential impacts and institute necessary protective measures in the event serious impacts do begin to occur including possible reinstatement of the ban;

WHEREAS, in consideration of the potential impacts from campfires in the Essex Chain Lakes Primitive Area, the Department has revised the Proposed Final ECLMC UMP to include a four-year monitoring program to establish a baseline and to monitor conditions at primitive tent sites and the surrounding firewood collection areas;

WHEREAS, the Department has committed in the Proposed Final ECLMC UMP to report to the Agency by the end of 2024 with a report on the four-year monitoring program, assessment of impacts and a recommendation for action based on that report;

WHEREAS, the Outer Gooley Parking Area is within the Hudson River Wild River Area and within the Blue Mountain Wild Forest;

WHEREAS, the proposed facilities for equestrian use in the vicinity of the Outer Gooley Parking Area are designed to minimize tree cutting and other physical impacts;

WHEREAS, the equestrian facilities are consistent with the APSLMP guidelines for Wild River Areas and Wild Forest;

WHEREAS, the Agency found that public motor vehicle access to the Outer Gooley Parking Area was consistent with the APSLMP in the ECLMC UMP in 2015; and

WHEREAS, the Proposed Final ECLMC UMP Amendment recognizes the need to protect the natural resources, improve public use and enjoyment of the area, avoid user conflicts and prevent overuse according to the guidelines and criteria of the APSLMP.

NOW, THEREFORE, BE IT RESOLVED, that pursuant to Section 816 of the Adirondack Park Agency Act, the Adirondack Park Agency finds the Proposed Final ECLMC UMP Amendment conforms with the general guidelines and criteria of the Adirondack Park State Land Master Plan;

BE IT FURTHER RESOLVED, that the Agency will consider the Department's report by the end of 2024 and an amendment to the UMP, if necessary, to address the impacts of campfires in the Essex Chain Lakes Primitive Area;

BE IT FURTHER RESOLVED, the proposed actions and management proposals in the Proposed Final ECLMC UMP Amendment are consistent with the social, economic and other essential considerations required under ECL Article 8 and implementing regulations from among the reasonable alternatives available, and which avoid or minimize adverse environmental impacts to the maximum extent practicable; and

BE IT FINALLY RESOLVED, that the Adirondack Park Agency authorizes its Executive Director to advise the Commissioner of Environmental Conservation of the Agency's determination in this matter.

Resolution adopted on this date, December 10, 2020.

AYES: Brad Austin, John Ernst, Mark Hall, Andrea Hogan, Art Lussi, Zoe Smith, Dan Wilt, Matt Tebo, Joe Zalewski

NAYS: Dr. Chad Dawson

ABSTENTIONS: Ken Lynch

ABSENT:

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Introduction

The Essex Chain Lakes Management Complex is located in the Towns of Indian Lake (Hamilton County) and Towns of Minerva and Newcomb (Essex County). The unit is approximately 19,600 acres in size; the land area was acquired by the State of New York and added to the Adirondack Forest Preserve in 2013. A Management Complex Plan (“Plan”) for the area was adopted in March 2016.

This Amendment contains a management proposal to remove the campfire prohibition proposal described in the 2016 Plan. It also proposes to improve the Outer Gooley Parking Area, particularly for equestrians.

Campfires

History

In March 2016, a Plan was adopted for the Essex Chain Lakes Management Complex (ECLMC). Due to anticipated high public use and quality of the shoreline vegetation, three measures were put in place to accommodate public use, while preventing unwanted natural resource consequences. The first measure was to allow shoreline camping on the Essex Chain Lakes and interspersed ponds at designated sites only. The second measure was to require tent sites be reserved through a permit system. During the first five years, the area sustained low camping use and the permit system seemed to be a barrier for visitors. In 2018, the camping permit system was discontinued.

The third resource protection measure was the prohibition of campfires within 500’ of the Essex Chain Lakes shoreline (including at designated tent sites). Development of a fire prohibition regulation was proposed, but never promulgated. To date, this fire prohibition has been managed by signage and public outreach. (Fires were not proposed to be prohibited elsewhere in the ECLMC.) The Plan discussed the ecological significance of the Essex Chain shoreline, and the impacts that campfires may have on natural resources, especially understory tree and coarse woody debris removal from firewood gathering.

Existing Conditions

The Department’s concerns with possible natural resource impacts of campfires have not changed. However, the area has seen low levels of public use since NYS acquisition and has not presented the level of concern that warrants continuation of this unique restriction. Since the area was acquired by the State of New York and opened to the public in 2013, visitor use has been low, as compared to anticipatory expectations. It is believed that the lifting of the waterfront campfire prohibition may not significantly increase public use levels in this area and will align it with nearly all other Forest Preserve units within the Park.

Usage Data

The Deer Pond parking area facilitates the majority of ECLMC access and is the entry point used by most visitors paddling or camping on the lakes/ponds. The trailhead register data from the Deer Pond parking area is below:

Deer Pond Parking Area Trailhead Register			
Year	Number of Users	User Days	Notes
2013	249	249	ECLMC open (only for day use) in fall 2013
2014	1,126	1,363	
2015	754	985	
2016	568	739	
2017	446	508	
2018	265	333	

These declining trailhead register numbers over time indicate an ongoing lessening of visitor use of the ECLMC. Ideally, a public survey would help to understand this trend. Anecdotally, the portage distances from the Deer Pond Parking Lot to Deer Pond, and from Deer Pond to Third Lake have been described as prohibitive to the average visitor. The unique fire prohibition for the shoreline tent sites has also been raised as an additional deterrent to public use.

The ECLMC is quite literally, a “complex” area. Multiple APA State land classifications, a variety of allowable public uses, and the landscape location of the area requires that potential visitors look twice at the area before visiting, to understand what opportunities exist and where. Removing the campfire prohibition around the Chain Lakes will contribute to simplified management and ease in visitor understanding of the area (fires allowed at all designated camping locations in the area). Through this Amendment, campfires will be allowed everywhere in the ECLMC (including where prohibited in the 2016 Plan), pursuant to general State Land rules and regulations.

Desired Conditions

Campfires at designated tent sites and lean-to sites will be facilitated by durable rock fire rings built by the Department. Fire rings accommodate fires in a safe manner that is resilient to initial and long-term use.

This management change will be used as a learning opportunity. The Adirondack region has relatively little observational data regarding the impacts of campfires on natural resources. General tent site monitoring protocols assess campfire impacts, such as loss of vegetative screening and ground cover, tree damage and user-created fire sites.

Wildland monitoring variables for tent sites and lean-tos will include tracking of impacted site expansion, soil compaction and vegetation loss, erosion, fire and firewood collection impacts, live tree damage, and presence of trash and human waste.

Proposed Management Actions

Objectives

- Facilitate consistent and simplified public use of the ECLMC
- Minimize effects of fires on the natural resources

Management Actions

- Build safe and durable rock fire rings at the Essex Chain Lakes waterfront tent sites. Fires will be prohibited until rock fire rings are constructed by DEC at each waterfront tent site
- Monitor conditions at tent sites and surrounding areas to measure use impacts, including those related to firewood gathering
- Reinstate campfire prohibition if impacts exceed acceptable thresholds
- Provide Leave No Trace outreach regarding minimization of campfire impacts, including alternatives to the traditional campfire for both cooking and aesthetics.

Removing the fire prohibition in the Essex Chain Lakes is not necessarily a permanent management action. If campfire use causes negative natural resource impacts, either within or outside of primitive tent sites, DEC may again prohibit campfires without another UMP Amendment. Conditions, monitored over time, will inform future decision-making. DEC and APA are in the process of developing a Visitor Use Management (VUM) framework that will inform decision-making. In part, this VUM framework will establish natural resource impact standards and thresholds. Exceedance of thresholds associated with campfire impacts (i.e., live tree cutting, tree damage, etc.) would prompt management action that could include prohibiting campfires at the Essex Chain Lakes waterfront tent sites once again.

Due to evolving outdoor technologies and wildland ethics, a campfire is no longer the only cooking, warming, and entertainment method available to overnight users at primitive camping sites. The Department will continue to promote these methods and encourage public stewardship to minimize natural resource impacts.

The construction of fire rings at Essex Chain Lakes waterfront tent sites will be completed in coordination with closure and relocation of several existing tent sites. Existing sites have been assessed, resulting in the future relocation of several sites to more desirable locations with greater capacity to withstand camping use.

Equestrian Facilities

History

The 2016 ECLMC Plan described and proposed equestrian opportunities, including parking, trail riding and camping. The ECLMC provides the opportunity for both relatively short distance equestrian riding, plus long-distance connections to communities and other areas of the Forest Preserve.

Existing Conditions

On the northern end of the unit, an equestrian parking and staging area exists near the beginning of the Chain Lakes Road North. It accommodates horse trailer parking and has an accessible mounting platform and kiosk. On the southern end of the unit, horse trailer parking is envisioned for the Outer Gooley Parking Area, but the current parking area only accommodates approximately six vehicles (without trailers).

Desired Conditions

Parking areas that are intended for horse trailer parking will allow for easy maneuvering, while having minimal impact on the surrounding environment. Signage and kiosks will provide trail

maps and minimally impactful outdoor recreation information. Gates, mounting platforms, sanitary facilities and other parking area features will remain free of trash and in working condition. Equestrian staging areas will be free from live tree damage, invasive species introductions and waste. Loss of ground cover vegetation will be limited to a minimal distance from the bounds of the parking areas.

Wildland monitoring variables for equestrian parking and staging areas will include parking surface erosion or expansion, sanitary facility conditions, presence of trash, waste or invasive species, and loss of ground cover vegetation.

Proposed Management Actions

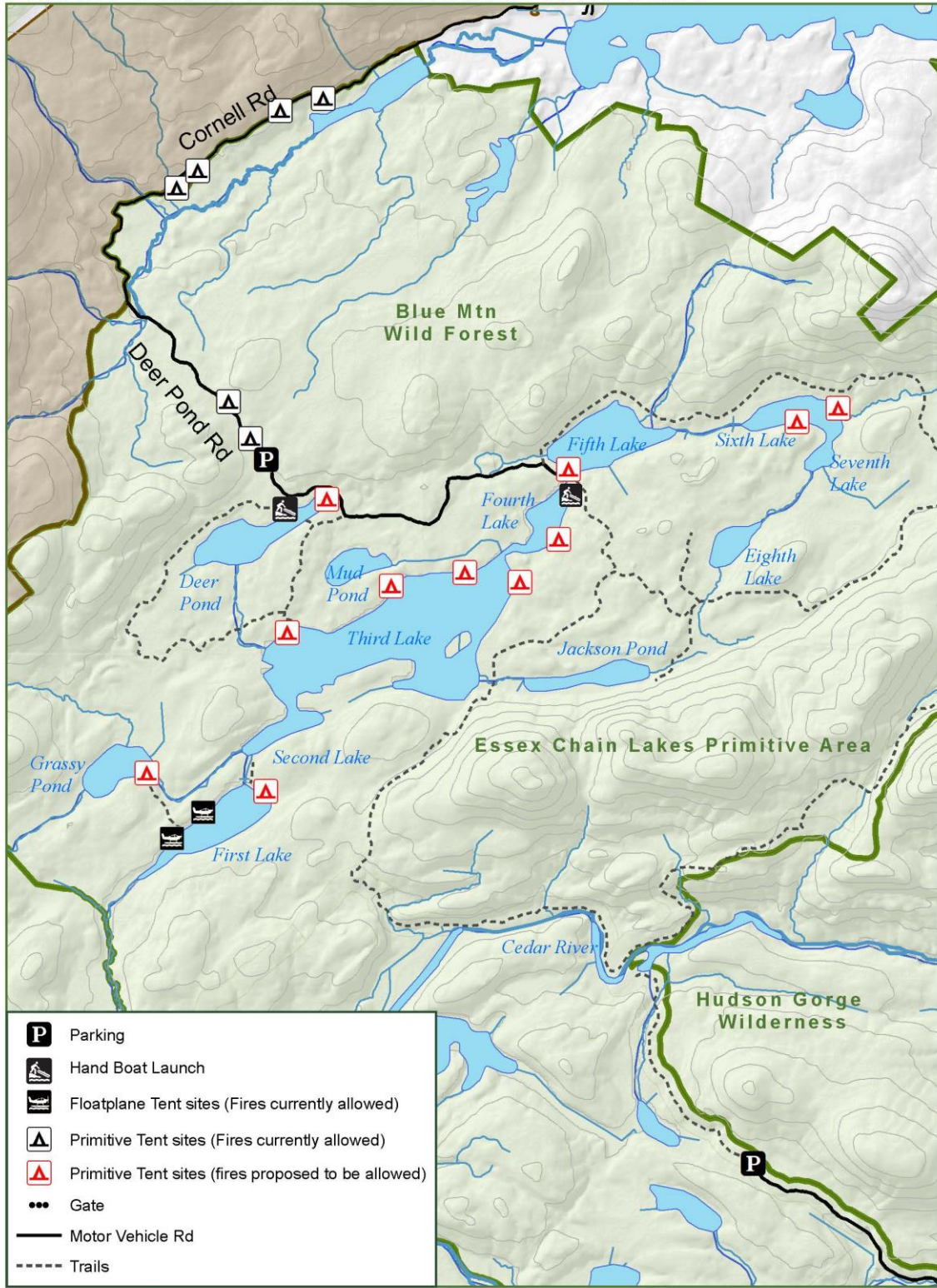
Objective

- Provide facilities that contribute to equestrian use of the ECLMC and prevent resource degradation;

Management Actions

- After the Outer Gooley building is removed and the site reclaimed, adapt the existing parking area to better accommodate parking maneuvers of up to six vehicles with trailers;
- Construct an accessible outhouse, an accessible horse mounting platform and hitching posts/rails at the Outer Gooley parking area;
- Install one or two kiosks in the vicinity of the Outer Gooley Parking Area. One kiosk will provide Forest Preserve use information, and the other may highlight the history of the area;
- Provide trail etiquette and Leave No Trace messaging at the Outer Gooley parking area, and at all other relevant access points.

Essex Chain Lakes Primitive Tent Sites



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Public Comments

Comment Period: July 15, 2020 – Aug 14, 2020

Campfires

The 2016 management plan thoroughly describes the impacts campfires have on the backcountry. A few key quotes from the plan:

“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.

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.

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.

Unburned refuse left in fire rings has attracted wildlife in search of food and leads to increased human/wildlife conflicts, especially with bears.”

The nature of these impacts has not changed since 2016, the laudable efforts by DEC and others to educate campers about Leave No Trace practices notwithstanding. I have seen these impacts myself during extensive backcountry travels in the Adirondacks, New England and elsewhere.

The current policy effectively addresses the impacts described above. The proposed change in policy would invite resource degradation.

The Department is committed to monitoring natural resource impacts over time, in order to assess potential impacts of this management proposal. If impacts are found to exceed accepted thresholds, the Department will take appropriate action to mitigate the impacts; including consideration of reinstating the fire prohibition.

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According to the 2020 draft Plan, “The fire prohibition is the other anecdotal negative feedback communicated about the ECLMC” (Page 4). We do not believe that anecdotal feedback should guide management actions, particularly as the DEC notes, “Ideally, a public survey would help understand” the declining number of visitors to the ECLMC each year. (Page 4) As the SLMP outlines, the protection and preservation of natural resources on state land is paramount. The collection and use of data to inform proposed management actions, rather than basing it on requests, anecdotes or untested theory, is integral to making appropriate management decision to protect such resources. In reviewing the 2016 ECLMC Plan, DEC intentionally prohibited the use of fires at campsites within 500 feet of the shoreline due the sensitive vegetation and the known impacts of campfires on surrounding natural resources. However, the 2020 draft amendment notes that there is “little observational data” regarding the impacts of campfires on natural resources. Additionally, the Eastern High Peaks (where the fire ban in the 1999 UMP appeared to help stimulate a significant recovery of vegetation) provides ample observational information on the value of a fire ban in protecting and restoring vegetation. Furthermore, the

2016 Plan stated that, "If and when the camping permit system is discontinued, camping in the entire ECLMC will be at designated primitive tent sites only, and the no fires rule will remain for primitive tent sites within 500 feet of the lakes/ponds." (Page 135) Fires were not intended to be allowed at the primitive tent sites, and it is unclear as to why DEC would propose to allow for this type of use when there is no discrete data to back up the management decision. The 2016 Plan also identified within its Action Steps that DEC would: "Monitor impacts of campfires and firewood gathering to identify potential degradation. Sites will be observed to ensure that fires only occur within designated fire rings, and that only dead and down wood is used for fuel." (Page 37) Were these elements monitored at other tent sites in the ECLMC? In the final draft, we encourage the DEC to share if and what types of monitoring information has been collected and how it informs the proposed amendment.

And, if the fire ban is lifted, what would be thresholds be for reinstating the fire ban if the impacts on surrounding natural resources are too great? Regarding the difficulty users have in understanding allowed uses in the ECLMC, we recommend changing the signage and labeling of the area to "Canoe" or "Canoe & Mountain Bike Area" if data collected shows that the labels lead to confusion. This would help alleviate the challenges of users understanding the complexity of permitted uses throughout the ECLMC. We support the goals of making sure the Essex Chain of Lakes is used for nonmotorized recreation, without degrading the ecological integrity or wild character of the site.

Importantly, given the very recent and alarming discoveries of Emerald Ash Borer and Hemlock Woolly Adelgid in the Park, minimizing opportunities for visitors to transport and potentially spread invasive species needs to be given serious consideration. Currently, the fire ban helps address this concern by dissuading users from bringing firewood to the area.

The Essex Chain waterfront tent sites have been monitored since they were established. The data shows that these tent sites are much, much smaller in impacted size than tent sites in other areas of the Adirondack Park. DEC and APA are developing a Visitor Use Management framework, and through that process, thresholds may be established for human impacts to natural resources. If campfire impacts in the Essex Chain exceed acceptable thresholds, then campfires may be prohibited again and sites rehabilitated.

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Here is my input for Essex Chain of Lakes: I support removing the ban on campfires so that campers can have a campfire. It would be easy to make safe campfire circles at each campsite. There is PLENTY of firewood and low fire danger.

Also, I recommend making the area where the Gooley Club buildings were a campsite.

Spend a little time and open/clean up the old trail to Jackson Pond. Put up a sign. Do the same for Eighth Lake.

Do some trail maintenance on the access road and trails. They are overgrown and thus a haven for ticks. It would not require a major effort here. Also brush cut/mow the camping areas on the way to the parking area. As they are now, they are not attractive spots to camp, and likely also a haven for ticks.

I have traveled, hiked and paddled throughout the Adirondacks for over 30 years. This area needs some sprucing up, some loosening of restrictions and some easier access. The St Regis Area is a shining star while Essex Chain of Lakes seems to be a neglected sibling.

On another note the biggest detriment to paddlers and visitors is the access situation. At 67 I am very lucky still to be able to access this waterway, thanks to the help of my spouse. It is 1.20 miles from the parking area to the access point at Third Lake. This is too far for most people, even those who have lightweight boats. So, I recommend allowing closer access, if only to drop off boats.

Finally, it was difficult to tell whether bait fish are allowed here. Typically, there is a sign prohibiting bait fish in trout waters, but there was no sign visible on my recent visit.

Thank you. The 2016 UMP proposes construction of a lean-to on Third Lake, at the site of the former Gooley Club camp. DEC maintains facilities and trails as resources are made available. Baitfish are prohibited in all of the Essex Chain Lakes and surrounding waters. Trails to Jackson Pond and Eighth Lake exist, and signage is replaced and improved on an ongoing basis.

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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/>

The ECL Management Complex Plan “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.”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 Park 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.

Thank you. DEC will work with our partner organizations to make information on the Essex Chain more available and continue to maintain accuracy on the DEC webpages.

.....

I would like you to know that our family recently opted against visiting Essex Chain Lakes specifically because of this [campfire] restriction. We love the Essex Lakes area and I encourage you to do all in your power to ensure passage of the amendment.

Acknowledged, thank you.

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I am writing to urge you and other DEC staff tasked with revising the UMP for Essex Chain of Lakes to *not* change the campfire rule. I have camped at this unit twice, and while I found the sites to be not ideal (there is little flat ground at most sites), I do not think allowing campfires will benefit the natural character of the place. Additionally, not having a fire while camping at this unit is not an inconvenience, in my opinion. The fire ban at lakeside sites likely reduces overnight use, but that is not always a bad thing. People, like me, do still use it and value it for being a quiet place without the live tree cutting and other signs of abuse that so many other remote destinations have.

Acknowledged, thank you.

.....

I'm writing concerning the pending change to the Unit Management Plan for the Essex Chain of Lakes Complex. Namely, I'm writing to oppose lifting the campfire ban in the Essex Chain.

I've explored a great deal of the Adirondacks and have witnessed how areas with campfires change the landscape. Every single scrap of wood for hundreds of feet around campsites are picked up and burned.

I feel this problem would be compounded in the Essex Chain. I have my doubts that campers will haul in firewood. Instead they will scrounge every piece of wood they can find. The DEC's amendment already discusses the long portage into Third Lake. If people are unwilling to haul their boat, it seems unlikely they're going to haul a boat, camping gear and firewood.

DEC is concerned that the Essex Chain is a low use area. Considering the high use in the High Peaks, I think having some areas of the park with low density is a blessing. However, if DEC is seeking increased usage, I don't believe campfires are the way to do it. Improved camping experiences would be a much better way to go. Adding a few more thoughtful campsites and getting rid of the undesirable sites would help.

I understand the local communities wanting to drive more traffic into the Essex Chain and applaud DEC being sympathetic to the desires of those communities. The Essex Chain got off to a rough start with an unpopular and somewhat confusing permit system. I believe some better promotion (maybe a "paddle the chain patch!") would be better than denigrating the camping experience by allowing campfires and all the subsequent problems.

Thank you. Several of the less-desirable waterfront tent sites in the Essex Chain will be relocated to more desirable locations that can withstand use.

.....
This is a response to the proposed removal of the ban on campfires at 11 primitive tent sites. During the initial drafting for this complex there must have been strong environmental and safety concerns pertaining to campfires at these remote sites, otherwise this ban would not have been adopted. Now that the usage is very low the Department wants to disregard the original environmental and safety concerns. Fires at these remote areas could easily get out of control resulting in extensive forest, wildlife and possible human losses. The department should take these concerns seriously, is it really worth this risk to maybe get a few people to use this area.

Acknowledged, thank you.

.....
In response to the draft amendment to the Essex-Chain Lakes Management Complex unit, we write to you from the perspective of homeowners on Goodnow Flow Road in Newcomb.

We are concerned with increased traffic in our area, invasive species being brought in with firewood, and risk of forest fires during this and future dry years. Our neighbors have seen evidence of several campfires at Essex Chain already. Many but not all persons with a campfire are careful. We think it is not wise to allow campfires at the Essex Chain.

Durable, rock fire rings will be constructed to facilitate campfires. There are existing regulations that prohibit the movement of untreated firewood more than 50 miles from its source.

Note: two additional comment letters were received that are very similar to the one above. Only one was included in this Response to Public Comment but the response applies to all three.

.....
I am writing to request that campfires be allowed at lakeside campsites. What has kept me away from the Essex Chain is the no campfire rule - whenever I can, I cook on an open fire rather than use fossil fuels & give money to the energy industry - trees are relatively renewable. Just do the best you can to educate visitors on proper use. I camp more often in spring & fall and a campfire is nice to have in cool weather.

Acknowledged, thank you.

.....
My son and I paddled the Essex Chain in 2016 and very much enjoyed the experience. We would have stayed overnight but was discouraged by the fire prohibition. I am writing to express my support to remove the campfire restrictions within the designated campsites on the Essex Chain of lakes.

Thank you for overseeing this precious new resource and we look forward to returning someday soon.

Acknowledged, thank you.

I have read the Essex Chain Lakes Primitive Area Amendment to the 2016 Essex Chain Lakes Management Complex Plan in its entirety. I am pleased that campfires may be allowed at the lakeside campsites.

I have visited the Essex Chain Lakes on several occasions, generally camping along the Rock and Cedar rivers, but I have avoided camping on the lakes proper due to the prohibition of campfires at the designated shoreline campsites. I do practice LNT, and you would have a difficult time to discover the locations where I have camped and even had campfires.

I do believe that individuals coming to the Essex Chain Lakes could be educated sufficiently to avoid most of the poor behavior that has been evidenced at other Adirondack wilderness areas and resulting shoreline site degradations.

Acknowledged, thank you.

.....

Please know that my wife and I are in favor of the proposed amendments to the management plan proposed. We have gotten to know the area very well and as horse people believe that the existing infrastructure is well suited for horse trips, etc. The changes would allow others to enjoy and increase usage for an underutilized resource.

Acknowledged, thank you.

.....

I am totally in favor of campfires being allowed at the Essex Chain Lakes. I have been here four times to paddle since it opened but have never camped for that very reason. I want to be able to cook on the open flame, perk my coffee, and smudge insects, as well as have a small social campfire in the evening. I do not believe campfires will have a huge negative impact. I paddle and camp extensively in areas of the Pharaoh Lake Wilderness and believe that the Essex Chain has a similar appeal. It isn't too difficult to get camping gear in for the more experienced backpack camper but may just be difficult enough for the less seasoned who are not looking for that remote experience, thus the area still may not see a huge increase in traffic.

There is a lot of dead downed wood in the Essex Chain and the sites are dispersed so one area will not be over harvested. Given the difficulty of hauling wood on the portages I do not believe many campers would bring their own wood.

I live in Essex County and would love to be able to utilize this property to the fullest.

Acknowledged, thank you.

.....

It is my understanding that the ban on campfires may be removed in the Essex Chain. Please keep the ban. 99.9 of people camping in the woods have a fire simply to entertain themselves; they're bored! People no longer cook on a fire, they bring stoves.

Campfires lead to tree cutting, and litter. People dispose of food scraps, aluminum foil, cans, and glass in the fireplace thinking it will burn.

Please keep the ban in effect.

DEC considered various options and their implications before arriving at the proposal to remove the campfire prohibition. Public outreach and education are vital to changing behaviors, and DEC is focusing on this. The Amendment also describes how this is not necessarily a permanent management action – that if impacts are found to exceed accepted thresholds, the fire prohibition may be reinstated.

.....

All for allowing campfires and building fireplaces at the Essex Chain, suggest constructing privies too.

Acknowledged, thank you. There are box privies at each existing tent site, and standard privies (outhouses) at parking areas.

.....

It took over 40 years to convince campers that campfires should not be allowed in sensitive backcountry areas such as the Essex Chain lakes, why would you want to discard all that education now finally realized? It would be a big mistake to think that people who seek a place for a campfire are a good fit for this area... all I see is a tendency for party groups and pyromaniacs to find their place in the woods, and whether on purpose or by accident, set off wildfires where there is not adequate access to control them. What happened to "leave no trace", which is the most prevalent modern backcountry philosophy, finally, and for good reason.

Additionally, we should not be encouraging overnight use in these areas anyway. If you are really seeking to increase usage of the Essex Chain area, you should allow the use of e-bikes as the logging roads are perfect for bicycles, and most of the population that has time available to recreate are retirees. E-bikes allow them to travel a lot farther in one day, encouraging day trips rather than more destructive camping activity. They would also then be using local lodging and food vendors, while exploring the back roads by day.

Please do not go back to the bad old days of campfires and all its destruction!

Thank you for the opportunity to comment. I will also be commenting on the horse travel idea. My family and I are all Adirondack lovers, St. Lawrence graduates since way back in the 1930s, my great uncle was a hunting/fishing guide and trapper in the early 1900's, and I own property on Goodnow Flow.

DEC considered various options and their implications before arriving at the proposal to simplify management and remove the campfire prohibition. Public outreach and education are vital to changing behaviors, and DEC is focusing on this.

E-bikes are prohibited on DEC lands, and therefore will not be allowed in the Essex Chain Lakes Management Complex Area.

.....

Do you really believe that there is "little observable data" regarding what will happen if fires are allowed? I don't and find this assertion ridiculous. There is plenty of data. Throw in the remoteness of the area to firefighting equipment and the inevitable wildfire threat. Do you still think this is a good idea?

DEC considered various options and their implications before arriving at the proposal to remove the campfire prohibition. DEC has baseline data on tent site conditions and will continue to monitor conditions after campfire rings are constructed and fires are allowed. If conditions monitored exceed acceptable thresholds, DEC may reinstate the campfire prohibition.

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Outer Gooley

It would be nice to see the Outer Gooley Club building removed - it is ugly.

Thank you. Due to the deteriorating condition of the structure and lack of compatible or necessary uses, the Outer Gooley building will be removed – pursuant to the 2016 ECLMC UMP.

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We do not oppose the expansion of the Outer Gooley Parking Area.

Acknowledged – thank you.

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Equestrian Facilities

Yes, yes, yes! Please expand trail access and parking for equestrians. Otter Creek trails are vastly popular equestrian trails with camping facilities and we'd like to have other beautiful trails to ride as well.

Acknowledged – thank you. Otter Creek is a model equestrian facility about which DEC has received a lot of positive feedback.

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As an equestrian, I am always looking for new places to ride. I don't mind travelling so much to get there because I have a LQ horse trailer and I just need a place to park put up a highline for overnight. I'm self-contained and am also a firm believer in carry in-carry out. I can go somewhere to ride and if I had to, I'd take my manure with me when I left. I'd rather spread it out in a discreet place away from where people gather but if it's an issue, I'll comply. I hope that this area can be set up for us to ride horses in. Many of us are self-contained and we like to meet somewhere and ride. We help the local economy when we stay for a time period because we patronize the local businesses. The longer the better!! Please make it accessible for us!!

Thank you for your understanding and willingness to practice Leave No Trace principles. DEC looks forward to providing improved equestrian opportunities.

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I was a recent member of the Gooley Club and have traveled most of the roads, paddled all the lakes and the Cedar River, and would like to comment on the Outer Gooley Club parking

area. The old building, if anything, should be converted to an Essex Chain Lakes and Hudson River information center rather than a big parking lot for horse trailers. As a major entry point to the area, it would be the perfect spot to educate the public and give out permits.

I fail to see the reason why you would want to encourage horse travel in that area, horses are destructive to the roads and not exactly able to comply with "leave no trace"! It would make far more sense to encourage bicycles than horses, and by the way, what is the reasoning that allows horses into the area but does not allow e-bikes? If the so-called reason is that people should have to get there under their own power, then horses should not be allowed either, nor should any bicycles or wheels because they provide a mechanical advantage to the traveler over walking. Not only that, cars are allowed in there during hunting season, so please explain that! And if you allow that, why not ATVs?

Now you are talking about allowing snowmobiles too... hmm, just don't understand the obvious philosophical disparity there. Please just admit to the grossly inconsistent policies and allow all travel choices that are not destructive. Campfires and horses are more destructive than through travel by snowmobiles and ATVs, not to mention e-bikes which are non-polluting and not destructive.

I don't even own an e-bike, but it just makes sense to allow them on the roads in the Essex Chain area. That would be the best way to encourage more responsible use of the area.

Thank you for allowing comments. I have also commented on campfires. I have a long family history of Adirondack camping and travel by car, foot, canoe, kayak, mountain bike, and ATV, and own property on Goodnow Flow.

E-bikes are prohibited on DEC lands, and therefore will not be allowed in the Essex Chain Lakes Management Complex Area. The former Outer Gooley site will be used for parking but will also include one or more educational and interpretive kiosks about the history of the area.

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I believe the tax dollars earmarked for the new [equestrian] infrastructure required can be better spent elsewhere.

Acknowledged – thank you.

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General

As a frequent user of the incredibly precious Chain Lakes trails and lakes for both biking and paddling, I would like to add my voice to your proposed amendments. I am in agreement but would add that a serious, realistic and conscientious monitoring of these amendment changes must be planned. I have some skepticism because the trail signage throughout the Chain Lakes is very poor and not kept up. Hiking or biking the area trails is challenging because of poor marking and missing or vandalized signage—case in point Jackson Pond. Also, I continually witness illegal ATV usage of trails, especially around the sections terminating near Polaris Bridge, and see no indications of enforcement or control against this, including illegal usage into the winter months destroying x-c and snowshoe trails in the Chain lands. So, the amendments are fine, but where's the commitment to staff and support their implementation? How hard is

putting up signage, trail markers, and doing occasional monitoring? Maybe a call for public adoption of trails is needed? Thanks for listening, love this area, it is a biking and paddling paradise.

Thank you. Efforts to improve signs are ongoing and DEC installs new or repaired signs as necessary. Thank you for the information about the Jackson Pond sign. It will be replaced. DEC continues to work to constrain illegal ATV use throughout the area, however the nature of ATV use poses challenges to enforcement. Unfortunate instances of illegal ATV use are hard to catch, but facilities will be improved as resources allow in order to prevent their occurrence.

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Please modify your plan to allow ATV and OHV vehicles. The surrounding areas suffer from economic issues. Allowing this traffic will help the residents economically. Look what's being done in tug hill, riding areas in Pennsylvania and Hatfield-McCoy trail system in West Virginia. Forcing ATV and OHV owners to travel out of the state to ride, does not help this state from its current economic decline.

DEC does not allow the type of experience you describe on the Forest Preserve. ATV use is not under consideration for this Amendment.

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Always support equestrian use. APA's PR provided very little detail. Hopefully, things will be able to proceed with the bridge across the Cedar River.

Acknowledged, thank you.

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Use data through 2018 show that use of the ECLMC is rather low. This is in stark contrast to other paddling areas in the Adirondacks that receive heavy use: St. Regis, Lows Lake, Little Tupper, Lake Lila, etc. In other words, there are numerous places in the Adirondacks where one can paddle a boat and set up camp, but only one area, the Essex Chain Lakes, that is likely to be uncrowded. If the campfire prohibition contributes to the low use numbers, the prohibition should be continued so that opportunity is preserved.

The amendment document indicates local communities would like to increase use of the ECLMC, presumably to boost the local economy. Having lived much of my life in rural communities with limited economic opportunities, I can certainly understand that perspective. In this case, however, I feel strongly that natural resource protection and preservation of a remote backcountry experience take precedence over possible benefits to the local economy.

The most recent use data included in the amendment document is from 2018. There recently have been numerous press reports of unusually high numbers of visitors to many Adirondack backcountry areas in recent weeks. Most of the stories have focused on use in the High Peaks, but postings on social media indicate similar crowded conditions at popular paddling destinations. Further, paddlesports retailers report a big jump in canoe/kayak sales to newcomers to the sport. The ECLMC may be experiencing more use as well, which would address, to some extent, local economic concerns and obviate the need for the campfire amendment. Since 2020 data are lacking, we do not understand if use of the ECLMC is affected

by this regional surge in popularity. Current information is needed before a management change of this magnitude is considered.

Implementation of the new approach to campfires would require DEC to monitor the area, identify unacceptable campfire impacts, and take appropriate management actions to address those impacts. All of these new needs would further stretch DEC's resources at a time with considerable budget and resource uncertainty. Reduction of staff or funds and shifting priorities could easily lead to a situation where the monitoring and follow-up doesn't happen, and any harmful impacts are allowed to persist. I appreciate the "can-do" attitude of DEC staff and leadership, but I seriously doubt that the agency will have the capacity to take on this additional management burden. With that said, I encourage DEC to increase its efforts to educate the public about Leave No Trace practices.

DEC has been monitoring and collecting data on Essex Chain waterfront tent sites since the area was opened to public use. These sites will continue to be monitored yearly. Using the Visitor Use Management (VUM) framework, natural resource conditions related to public use will inform future decision-making in order to preserve the wildland character of the area.