Amendment to the Generic Unit Management Plan for Campgrounds and Day-Use Areas (Electric Vehicle Charging Stations)

FINAL

January 2019

New York State Department of Environmental Conservation
Division of Operations, 3rd Floor
625 Broadway, Albany, NY12233

Governor ANDREW M. CUOMO
Commissioner BASIL SEGGOS
MEMORANDUM

TO: The Record
FROM: Basil Seggos
SUBJECT: Campground Generic UMP amendment

The Campground Generic Unit Management Plan Amendment has been completed. The Adirondack Park Agency has found the Amendment to be in conformance with the Adirondack Park State Land Master Plan.

The Campground Generic UMP 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: 1/7/19
SUMMARY

Generic Unit Management Plan (UMP) for Campgrounds and Day-Use Areas Amendment

This is an amendment to the Final Generic UMP for Campgrounds and Day-Use Areas adopted August 1990. The generic UMP provides information on the environmental setting, inventory of facilities, organizational structure, issues, constraints, management objectives, and effects for Campgrounds and Day-Use Areas in both the Adirondack and Catskill Parks.

The proposed amendment will allow for the construction of Electric Vehicle (EV) charging stations at Intensive Use Area facilities managed by the New York State Department of Environmental Conservation (DEC), Division of Operations. The EV charging stations will provide the public an opportunity to charge electric vehicles when using DEC campgrounds and day-use areas.

DEC manages 51 campgrounds in the Adirondack and Catskill Parks with over 1,000,000 visitor camper nights each season. The campgrounds and five special use areas at Lake George Beach, Prospect Mountain Highway, Hinckley Reservoir Picnic Area, Fourth Lake Picnic Area, and Lake George Battlefield Picnic Area also receive nearly 400,000 day-use visitors annually.

The environmental assessment of this proposal shows that no significant adverse environmental impacts will result from implementation of this plan.
Background

DEC manages 51 campgrounds in the Adirondack and Catskill Parks with over 1,000,000 visitor camper nights each season. The campgrounds and five special use areas at Lake George Beach, Prospect Mountain Highway, Hinckley Reservoir Picnic Area, Fourth Lake Picnic Area, and Lake George Battlefield Picnic Area also receive nearly 400,000 day-use visitors annually.

Campers and day-use visitors arrive at these DEC facilities from every county in New York and from most states and Canadian provinces. These facilities are in some of the most isolated places in the state, often far from the services visitors would find in more urbanized areas. Due to the remote locations and lack of alternative modes of transportation, nearly all visitors arrive by automobile.

Clean Transportation Concerns

The transportation sector is one of the largest contributors to greenhouse gas emissions in New York State. Compared to gasoline-powered cars, electric cars are more energy efficient and cost about 50 to 70 percent less to operate per mile. As part of Governor Cuomo’s goal to reduce greenhouse gas emissions and ramp up renewable energy sources, New York State has made several comprehensive investments in clean vehicles and infrastructure, including municipal rebates that are putting more electric vehicles on the road and electric charging stations in locations across the state.

Proposal to Construct Electric Refueling Stations at DEC Facilities

There are approximately 30,000 electric vehicles registered in New York, and with more than 9 million standard vehicles currently registered, the potential for future growth is great. There are less than 1,000 locations in New York State where the public can refuel an electric vehicle. Many rural locations in the state are beyond the mileage range of many electric vehicles. The benefits of adding EV charging stations include expanding areas in the state where electric vehicles can be driven; reducing gas emissions in more areas; and reducing overall gas consumption with the use of more fuel efficient vehicles. In conjunction with the State’s efforts to install electric vehicle recharging stations at state parks, DEC is proposing amending the Final Generic UMP and Environmental Impact Statement for Campgrounds and Day-Use Areas to permit the construction of EV charging stations at selected facilities.
Charging stations will not be associated with individual campsites. Furthermore, not all facilities are appropriate for EV charging stations. Facilities will be evaluated using the following criteria to determine suitability for EV charging stations;

- The facility must not be located near an existing public charging station.
- The facility’s visitor demographics must support the installation of charging stations.
- The facility must have adequate electrical service or require minimal service upgrades to accommodate a charging station.
- Construction would not require significant topographic alterations, wetland impacts or vegetative clearing.
- Siting of charging stations would minimize user group conflicts by placing stations near existing maintenance and support structures, highly visible to and monitored by facility staff.

EV charging stations, parking and associated infrastructure will be scaled to minimize the footprint of said development while also providing adequate opportunity for patron use. Each EV charging station will consist of a one-or two-port, commercially available charger, pedestal support, signage, protective bollards, and associated wiring. Level 1 chargers (standard plug) require 20-amp 120-volt electrical circuit per port. Level 2 chargers require a 2-pole 40-amp circuit per port. Single chargers will be placed to service up to two parking spaces. Dual chargers will be placed to service two or three parking spaces. All feasible measures will be taken to minimize visual impact of the charging stations while also meeting siting criteria.
Figure 1. Sample charging station layout

Figure 2. Vehicle charging station locations 2018
Exhibit #1 – Response to public comments

Written comments were received until September 30th, 2018. Comments were reviewed by Department staff and responses are posted here as part of the Final Unit Management Plan.

Comments regarding compliance with State Land Master Plan

Public – The basic design included in the draft amendment to the Generic Campground UMP does not comport with the basic requirements of the Adirondack State Land Master Plan. The guidelines state that “All facilities and appurtenances are to be constructed of natural materials to the fullest extent possible so as to blend with the natural environment.” The rough plans in the Amendment show hardened sites with concrete much more suitable for a shopping center or other location in a hamlet area. There must be a design which is more consistent with the rustic nature of campgrounds and day use areas and we hope that you will explore other options. One way we suggest that you may accomplish this goal and improve the proposed plan to be compliant with the Adirondack State Land Master Plan would be to require these charging stations to be located off-site, perhaps with other service utility locations. In short we believe there are improvements that should be made before changes are made to the Generic Campground UMP.

Public – On that topic - the Adirondack State Land Master Plan—how do these electric vehicle hookups comply with the opening expectation found on page 43. It says that, “All campgrounds will be of a rustic nature without utility hookups....”. At the least this amendment should explain or discuss how the proposed electrical vehicle charging stations and provide an interpretation in consultation with the Adirondack Park Agency how these hookups are conforming.

DEC response – For the purpose of the master plan, utility hookups refers to connections in campsites from camping equipment to facility utilities. For the proposed amendment, these electric connections would be located away from the campsites. The masterplan does allow for hardening of the resources such as roads, parking areas and trails to minimize further degradation. Charging stations would be located where it requires a minimum topographic alterations, will not impact wetlands and will limit vegetative clearing.

Comments regarding type of charging stations needed

Public – It is important to note that Level I charging (120V single-pole power) is too slow to be practical for EV drivers. Level 1 charging apparatuses typically provide about 1440 watts maximum power. This is only enough to charge the vehicle at a rate of 5 miles of range per hour of charge. In order to be useful for visitors the installed equipment should be Level 2, capable of supply 32A at 240 V.

Public - As a relatively early-adopter of battery EV technology I recognize that some of the intricacies of EV travel are the small price paid for being on the leading edge of a rapidly-growing wave of adoption. The installation of Level 2 EV chargers at DEC campgrounds would make family travel to and within the Adirondack interior more safe and comfortable. It would result in less fossil fuel consumption, less air and water pollution, and less undesirable noise for all visitors and residents of the region.
Public - The plugs should be universal or a selection for the different cars that do not use the same charging stations.

Public - I believe the primary focus in terms of opening up EV traffic should be getting fast charging implemented every 50 miles or so on the major arteries (esp. I-87, I-90). It's great to have the level 2 stations or even 110 outlets for the camping areas where the speed of recharging is not so vital. DC fast charging at key locations in the ADK Park such as Lake Placid, Old Forge, Tupper Lake, Speculator, etc. would help open up travel to EVs with less than 200 mile range.

Public - First, level 1 charging stations are virtually useless for electric vehicles that have big enough batteries to reach the Adirondack or Catskill Park. Why? Because a 20-amp 120-volt electrical circuit can only deliver 3-4 battery miles for every hour they’re charging! That means if an electric car, starting at full, used 70 battery miles to get to the DEC park where a level 1 charging station is located, they will have to charge that car for the next 18-24 hours to replace that usage, either to be sure that they could go further into the Park or return to where they started from. No-one on a day trip has that kind of time.

Public - However, what the popularity of that single level-3 charging station in Rome showed was that there probably need to be level-3 charging stations at identified “gateway” DEC facility locations to allow electric vehicles which have seriously depleted their batteries just getting to the Adirondack or Catskill Parks to relatively quickly re-charge to continue to locations in the interior of the Parks. Certainly there needs to be some coordination between NYS Parks and the DEC to decide whether to provide level-3 charging stations at state parks which are near the Adirondack and Catskill Parks as well as gateway DEC campgrounds in the Parks. For example, Delta Lake State Park outside of Rome and Nick’s Lake Campground in Old Forge are both on major routes from the west and south into the Adirondack Park, and probably both would benefit in increased visitors if both had level-3 charging stations available.

DEC Response – The Department will design the proposed charging facilities taking these comments into consideration.

Comments regarding current number of existing charging stations

Public – The map in DEC’s Draft publication shows perhaps a dozen charging stations in Hamilton County. I suspect that this information is incorrect. The only publically available Level 2 EV charging station I can positively identify is at the Adirondack Museum in Blue Mountain Lake.
The others may be for Tesla vehicles only, or located at resorts for the use of overnight guests. They may include RV hookups or Level 1 charging stations which are too slow and can be as rudimentary as an outdoor outlet on the side of motel or convenience store. Those are not worth including in your study of public charging availability. I recommend considering only publically available SAE J1772 Level 2; CHAdeMO; or SAE CCS EV charging stations when determining proposed locations of DEC stations.

Public - . I am glad to see the state making an effort to provide EV charging stations near state campsites and through the Adirondacks. Currently VT has a great network of DC fast charging. I know that there is a charging station coming to south of exit 18 on the Northway. Outside of that, the most northerly one is in Troy. I drove out to Utica this past weekend and took advantage of fast charging at the Mohawk Valley welcome station on
the Thruway, which was very nice. If I were going to try to drive to Montreal, I would be doing it through VT at the moment because of the distribution of DC fast chargers.

DEC Response – The Department will consider existing and proposed charging stations as part of the overall criteria when evaluating the need and locations for new charging stations.

**Comments regarding charging for use of charging stations.**

Public – It is my opinion that the technology has matured to the point where customers are willing to pay for the charge. That could result in modest revenue at DEC campgrounds.

Public - EV charging stations have the capability of being “networked”, which typically refers to stations that have the ability to meter electricity passing through the unit, provide load management and scheduled charging features, provide for payment and access control, and incorporate two-way communication from the EVSE to the driver as well as the station operator. Deploy networked EV charging solutions to ensure that stations can be made available to as many visitors as possible and that costs can be managed efficiently.

Public - Since one pays for gasoline for one’s personal vehicle, it would make sense that the DEC would charge, or eventually charge, for charging at its EV charging stations. This would also be a way for the DEC to create a fund for upgrading electricity infrastructure for level-3 charging stations at DEC facilities that would need that upgrade in the near future. No mention is made of this in the Draft Amendment.

DEC Response – The Department is evaluating the cost-revenue benefits and has not determined if there will be a charge for users at these charging stations.

**Comments regarding requirement that campgrounds require minimal upgrades to accommodate a charging station**

Public - Since the existing electrical service for campgrounds were rarely sized with EV charging stations in mind, allowing flexibility in determining what constitutes “minimal service upgrades to accommodate a charging station” would be in the public interest.

DEC Response – The costs of upgrading electric services at a facility could be significant and will be part of the criteria used to select facilities that will receive charging stations.

**Other Comments**

Public - Sorry, but this is by far one of the most ridiculous ideas for DEC campgrounds yet!!! Many campgrounds are too far away from any other metropolitan areas for any electric vehicles to even get to the campgrounds to recharge let alone to get home!! Buck Pond??? Meacham Lake???? Lake Durant?? Really? A waste of money that could be used for much more than this!! tremendous advantage.

Public – We are a SCVOB. I would like more information about being an installer for them. If you look in the registry of businesses, we are Southern Adirondack Home Services DBA Mr Electric of Queensbury.
DEC Response: Any contract work to install charging stations will be advertised and bid in conformance with State requirements.

Public - We must compliment the forward thinking and willingness of the Department and the State to promote electric vehicle usage even though there is great financial risk of low usage. It is certainly bold to propose using public dollars to place electric vehicle charging stations in campgrounds which are open only 4 months of the year and where the presence of electric vehicles is extremely low.

Public - I think that's a great idea, but it isn't clear to me what powers the chargers? Wind or solar? Or?

DEC Response: The power for chargers will be supplied by the local utility. The method of power production can vary.