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Governor

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## MEMORANDUM

TO: Terry Martino, APA  
Judy Drabicki, DEC

FROM: Rick Weber, APA  
Karyn Richards, DEC

DATE: August 29, 2019

RE: Response to Public Comments for “Management Guidance: Siting, Construction and Maintenance of Primitive Tent Sites in Wilderness, Primitive, Canoe and Wild Forest Areas on Forest Preserve Lands in the Adirondack Park”

In June 2019 Department and Agency staff presented the Agency Board with a draft guidance document entitled “Management Guidance: Siting, Construction and Maintenance of Primitive Tent Sites in Wilderness, Primitive, Canoe and Wild Forest Areas on Forest Preserve Lands in the Adirondack Park” and requested authorization to proceed to public comment. The public comment period began on June 14, 2019 and ended on July 18, 2019.

Staff received 17 comments on the draft guidance, which are summarized below. Where warranted, a response from Department and Agency staff is included in italics. Changes made to the document in response to public comment and/or based on further staff review includes: (1) A recommendation for developing maintenance and inspection schedules based upon levels of use and site location; (2) A recommendation to incorporate site restoration techniques whenever new features such as raised earthen tent pads or sidehill tent pads are added to existing tent sites; (3) editorial changes to clarify language used throughout the document.

### Summary and Response to Public Comments

#### **Comment: General Support**

*Response: Numerous comments were made in support of various recommendations in the guidance.*

**Comment: Recommending regular routine maintenance schedule and increased enforcement of violations in order to discourage abuses such as trash and overfilled outhouses.**

**Response:** *The guidance has been revised to include a recommendation for developing maintenance and inspection schedules.*

**Comment:** **Don't move sites away from Shorelines. The shoreline and the water are the attraction.**

**Response:** *The Department has the discretion to site Primitive Tent Sites adjacent to shorelines in locations where the sites will be reasonably screened from the waterbody, human waste will be disposed of a sufficient distance from water resources (pit privies must be a minimum of 150 from the mean high water mark of any lake, pond, river, stream, or wetland) separation from other nearby Primitive Tent Sites has been adequately planned for pursuant to Master plan requirements, and terrain characteristics will minimize the possibility of significant erosion impacts. Certain existing Primitive Tent Sites that are creating unacceptable amounts of resource degradation adjacent to shorelines will be closed or relocated in a manner that addresses the resource degradation while continuing to provide a quality camping experience.*

**Comment:** **Do not restrict fires. The social and spiritual significance of campfires is an important part of the camping experience.**

**Response:** *The Department has the discretion to regulate campfires to protect public and private resources. Fires and firewood gathering can cause widespread impacts to campsites by removal of all dead and downed material. It is also necessary to regulate campfires for public safety. Through the UMP process the Department will continue to allow campfires where appropriate.*

**Comment:** **Provide opportunities for camping along roadsides.**

**Response:** *This guidance provides a framework for how camping along roadsides will be managed in conformance with the Adirondack Park State Land Master Plan and other relevant laws and regulations. The guidance provides opportunities for roadside camping at designated sites or through camping permits during the big game hunting season.*

**Comment:** **Good campsites are important to local economies.**

**Response:** *While the economic impact of Primitive Tent Sites is not a topic for this document, the Department and the Agency recognize the importance of providing a high-quality primitive camping experience that protects natural resources and provides a valuable community asset.*

**Comment:** **Roadside camping is intensive use camping.**

**Response:** *The guidance carefully considers how roadside Primitive Tent Sites will be designed and managed to assure that the character of the tent site retains an inherently*

*wild and undeveloped character. Campers should expect that roadside Primitive Tent Sites will be significantly less developed than the camping opportunities found within DEC campgrounds.*

**Comment: Screening for roadside camping is impractical and unrealistic.**

***Response:** Screening serves as a buffer and not a perfect barrier between the Primitive Tent Site and the adjacent roadway. Certain forest types and terrain are more conducive to screening than others. The guidance advises managers to consider these factors carefully during the layout of new sites and the relocation of existing sites. When less natural screening is available, the separation between the roadway and the Primitive Tent Site will be increased.*

**Comment: State that Primitive Tent Sites are a service to Forest Preserve visitors, and that service should provide a high-quality experience.**

***Response:** In addition to providing a more consistent management approach for Primitive Tent Sites throughout the Wilderness, Primitive, Canoe and Wild Forest lands of the Adirondack Park, the guidance also provides clarity regarding what degree of resource impacts are acceptable at Primitive Tent Sites. This approach serves to protect and preserve the high-quality primitive camping experience Adirondack visitors and residents seek.*

**Comment: Some Primitive Tent Sites may need to be part of a permit system in high use areas.**

***Response:** Implementation of a permit system is beyond the scope of this guidance.*

**Comment: Large capacity campsites on the water are needed for Canoe trekking programs.**

***Response:** Primitive Tent Sites and their capacity are defined by the Adirondack Park State Land Master Plan (APSLMP). This guidance is intended to be in compliance with the APSLMP.*

**Comment: Include Primitive Tent Sites along the Remsen Lake Placid Travel Corridor.**

***Response:** Primitive Tent Sites are designated through the UMP process and not this guidance.*

**Comment: Clarify how the footprints of individual and groupings of Primitive Tent Sites are selected and measured. 1200/2400/1600 sq. ft. footprints of individual and groupings of Primitive Tent Sites seems larger than necessary.**

**Response:** *The footprint of a primitive tent site is measured, as part of a primitive tent site assessment, using the “Cole” method. This method is described in the US Forest Services publication titled “Wilderness Campsite Monitoring Methods: A Source Book” by David N. Cole. The boundary is the obviously disturbed part of the site. The square footage is calculated by measuring the limits of the site, which includes the sleeping area, the cooking/campfire area, and other areas disturbed by human activity. Trails, for example leading to the privy, are not included.*

*The square footage identified in the guidance for individual Primitive Tent Sites (1200 sq. ft.), groupings of individual land access sites (2400 sq. ft.), and groupings of individual water access sites (1600 sq. ft.) serve as the largest size considered appropriate. The assessment of over 100 existing Primitive Tent Sites within Wild Forest and Wilderness lands has served to inform the size thresholds described in the guidance. The square footage for individual Primitive Tent Sites reflects the space necessary to provide space for not more than eight people, three tents and a common area that may include a fire ring. The square footage for groupings of individual water access sites reflects the space necessary to provide space for not more than 12 people, four tents and a common area that may include a fire ring. The square footage for groupings of individual land access sites reflects the space necessary to provide space for not more than 20 people, numerous tents and a common area that may include a fire ring.*

**Comment: Clarify accessibility requirements and limitations. Explain how accessible sites impact ecological resources and wild character.**

**Response:** *The Department uses the US Access Board’s Final Guidelines for Outdoor Developed Areas as guidance for the creation and alteration of Primitive Tent Sites to ensure compliance with the requirements of the ADA. Department ADA Coordinators will ensure Department compliance with the ADA.*

*ADA sites are designed to avoid additional environmental impacts. Only slight modifications to existing designs are needed to provide for accessibility. The privy used to make a site accessible in the backcountry is the same design as the box toilet currently used by the DEC in the backcountry. If a fire ring is provided it needs to be raised to make it more accessible. Tent pads if provided will require access routes.*

**Comment: Raised earthen tent pads should be limited to areas where high use is resulting in natural resource impacts.**

**Response:** *Raised earthen tent pads will be used in locations where high use has created unacceptable resource impacts and a tent pad will help the site recover. The Department may also implement this feature, in consultation with the Agency, in locations where it can serve to minimize site sprawl before it happens, and not solely as a reactionary measure. The guidance has been modified to include language that emphasizes the need to incorporate best practices for site restoration whenever raised*

*earthen tent pads are placed at sites where unacceptable resource impacts are occurring.*

**Comment:** Clarify how at large sites may become formally designated. Also, explain how limitations on number of sites in a given area will be handled.

**Response:** *Primitive tent sites may become formally designated through the Unit Management Planning (UMP) process. Where severe constraints prevent attainment of the ¼ mile separation guidelines, lesser separation may be provided through the UMP process.*

**Comment:** Support hammock camping with specific design features.

**Response:** *Primitive Tent Sites will not include purpose-built features to accommodate hammock camping. Certain sites will naturally be more conducive to this type of camping than others.*

**Comment:** Recognize the importance of the primitive camping experience to human health and well-being.

**Response:** *The value of a high-quality primitive camping experience to human health and well-being is recognized and acknowledged. This guidance will help assure that campers have a high-quality experience that is consistent with the management objectives of the land.*

**Comment:** Consider the impacts to private lands when siting Primitive Tent Sites.

**Response:** *Impacts to private lands from the siting of Primitive Tent Sites are addressed in individual Unit Management Plans.*