



**ANDREW M. CUOMO**  
Governor

**TERRY MARTINO**  
Executive Director

**MEMORANDUM**

TO: Rick Weber

FROM: Walt Linck, Environmental Program Specialist 2 (Natural Resources) /s/ WL

DATE: December 2, 2020

RE: Final Draft Amendment to the 2016 Essex Chain Lakes Management Complex UMP

Staff have completed review of the final draft amendment to the 2016 Essex Chain Lakes Management Complex UMP and believe it to be in compliance with guidelines and criteria of the Adirondack Park State Land Master Plan (APSLMP).

In summary, two management actions are proposed via this amendment: the rescinding of the existing ban on campfires at primitive tent sites on the shores of the Essex Chain Lakes (a proposal made within the 2016 Plan), and the development of an equestrian parking/staging area at the site of the old Outer Gooley Club on the banks of the Hudson River.

The comment period for public comments on the amendment's compliance with the APSLMP ran jointly with DEC public comment period, from July 17 to August 14, 2020, and ten comments were received by the Agency during that time period.

Regarding these, the most noteworthy comments in staff's view are those expressing serious concerns about the proposed rescinding of the campfire ban. And while these concerns are legitimate in our estimation (especially given the related, approved language of the 2016 UMP and what is known about the full range of potential impacts of campfires in wild areas), staff do not believe the proposed action renders this amendment to the UMP noncompliant with the guidelines and criteria of the APSLMP.

The APSLMP does not specifically address the issue of campfire impacts beyond that of the potential fire hazard, and when the entire range of camping impacts to the fragile, high-elevation areas of the High Peaks was of particular concern to Agency staff, an APSLMP guideline specifically addressing this was drafted and approved. Since this

amendment does clearly acknowledge the potential for serious campfire impacts to occur in the highly valued shoreline areas of these lakes and proposes: 1) a focused program to monitor for them; and, 2) an institution/reinstitution of protective measures in the event serious impacts do begin to occur (including possible reinstatement of the ban), staff consider this proposed action – as well as the proposal to develop the equestrian staging area – to be acceptably focused on protection of natural resources.