

Division of Operations

Bureau of Recreation

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**2016 Cranberry Lake Public Campground  
Unit Management Plan Amendment  
PROPOSED FINAL**

Town of Clifton, St. Lawrence County, New York

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**SEPTEMBER 2024**

New York State Department of Environmental Conservation

Division of Operations, 3<sup>rd</sup> Floor

625 Broadway, Albany, NY 12233

Governor KATHY C. HOCHUL

Interim Commissioner SEAN MAHAR

## **UNIT MANAGEMENT PLAN AMENDMENT #1**

### **Preface**

The Department of Environmental Conservation (“Department”) developed this amendment to the 2016 Unit Management Plan for the Cranberry Lake Public Campground Intensive Use Area pursuant to, and consistent with, relevant provisions of the Environmental Conservation Law (ECL), the Executive Law, the Adirondack Park State Land Master Plan (“Master Plan”), DEC rules and regulations, Department policies and procedures, and the State Environmental Quality Review Act.

The Cranberry Lake Public Campground is classified by the Adirondack Park State Land Master Plan as an Intensive Use Campground and Day Area and is managed by the Department as such with an emphasis on the area’s rustic and natural value. The Cranberry Lake Public Campground is pursuant to all statutes and laws related to the governance and management of Intensive Use Areas as outlined by the Adirondack Park Agency (APA) and Department.

The APA initially adopted the Master Plan in 1972 with advice from and in consultation with the Department, pursuant to Executive Law §807, now recodified as Executive Law §816. The Master Plan provides the overall framework for the development and management of State lands in the Adirondack Park, including those State lands which are the subject of this amendment.

Executive Law §816 requires the Department to develop, in consultation with the APA, individual unit management plans (UMPs) for each unit of land under the Department’s jurisdiction which is classified in one of the nine classifications set forth in the Master Plan. The UMPs must conform to the guidelines and criteria set forth in the Master Plan. Thus, UMPs implement and apply the Master Plan’s general guidelines for areas of land within the Adirondack Park. To put the implementation of the guidelines and criteria set forth in the Master Plan into actual practice, the Department and APA have signed a Memorandum of Understanding concerning the implementation of the State Land Master Plan for the Adirondack Park. The document defines the roles and responsibilities of the two agencies, outlines procedures for coordination and communication, defines a process for the revision of the Master Plan, as well as outlines procedures for State land classification, the review of UMPs, state land project management, and state land activity compliance.

This project has been reviewed in light of Commissioner Policy 49 (CP-49). This project does not pose a risk for climate change, greenhouse gas emissions, or sea level rise. It does not further impact disadvantaged communities.

DEC developed this Unit Management Plan Amendment for the Cranberry Lake Public Campground to allow installation of an accessible playground in the area of the amphitheater. This will enhance the recreational experience of visitors to Cranberry

Lake Campground. Consistent with the above statutory authority and the Master Plan, this amendment proposes the construct of a playground that will maintain the area's rustic feel through aesthetic choices related to the playground.

## **Background**

The Cranberry Lake Campground is located just south of the Hamlet of Cranberry Lake in the Town of Clifton. It is accessible by vehicle from Lone Pine Road. The DEC Division of Operations manages the site.

Cranberry Lake's impoundment and size is the result of a concrete dam constructed in 1916. By virtue of a law passed in 1865, the stated purpose of which was to improve navigation and hydraulic power and check freshets on the Oswegatchie River, the predecessor of the present dam at Cranberry Lake Village was erected in 1867. Dam construction and acquisition of lands for flooding, maintenance and regulation of the dam are matters handled by the Commissioners for Improvements on the Oswegatchie River. The lands this body acquired have been held to be State lands but not part of the Forest Preserve.

Cranberry Lake Campground has developed through several phases of construction. The Civilian Conservation Corps developed the original 15 camping sites in 1935. Work was accomplished with hand tools and wheelbarrows. The supervisor's cabin was constructed in 1937 and the date and several names were engraved in the foundation. Bathhouses and vault latrines followed. Expansion consisted of construction of the "peninsula loop," which was completed in the early 1960s. At this location, some of the most desirable camping sites are to be found. Loops I-V were completed in the late 1960s. They more than tripled the occupancy capacity of the campground and contain prime waterfront sites. The lifeguard cabin, garage, and amphitheater were also constructed at this time. A central shower house was constructed in 1979. In 2001, a 12' x 24' addition was constructed, along with rehabilitation of the original structure. This included adding new showers and dressing stalls, a tile floor, siding, roof, ventilation, and ADA accessibility. Additional buildings constructed were a 20' x 40' picnic pavilion in 1991 and a 16' x 24' recycling center in 1992.

In spring 1993, an Environmental Education Program was started at the campground and a 16' x 18' cabin was built to house an Environmental Education Assistant and a Park and Recreation Aide IV to oversee the program. This program was designed to provide activities for campers of all ages, with both day and nighttime activities scheduled. Although very popular, the program may not be provided every year due to staff and funding limitations.

In 1992, water wells were developed and put in use as the preferred alternate water source to comply with the new "Drinking Water Regulations" under the State Sanitary Code. Two 10' x 10' pump houses were also constructed. Alternate or backup wells were drilled in 1999 and were put in use in 2002.

The latest building to be constructed, in 2002, was the 18' x 26' comfort station in the Upper Loop of original Campground Sites 1-13. This modern flush bathroom replaced the old vault dry toilets.

Federal monies were involved in improvements at this campground under the Land and Water Conservation Fund. The Department of Interior, through the National Park Service, requires that this facility be inspected every five years. This inspection, conducted by the grant administrator in the DEC Central Office, is to ensure the facilities continue to be properly maintained and used in conformity with the grant award. A Land and Water Conservation Fund sign is posted at each campground where federal funds have been involved.

### **Facility Selection and Implementation**

The construction of a playground is not proposed in the 2016 Unit Management Plan, and as a result this amendment seeks to allow for the construction of a playground in the parking lot area, replacing the current amphitheater. To conform aesthetically to guidelines related to Intensive Use Areas, natural materials such as cedar logs, mortise, and tenon joinery will be attempted to be used in the construction of the project. Once implemented, the playground will complement the environment and contribute to the preexisting rustic feel of the campground and surrounding natural area. The goal of this amendment is to allow for a playground that benefits the recreation of campers while still maintaining the primitive aesthetic important to the Adirondack Park.

We can look to other Intensive Use Areas for examples of playgrounds that blend well with the local aesthetic of the area.

### **Management and Selection of Preferred Surface Alternatives for ADA Compliance**

#### **Alternative 1 – Poured Rubber**

The base of the playground could be filled in with a poured rubber surface, ensuring the highest possible level of accessibility as outlined in the 2011 ADA standards (Marshall, 2011). These types of surfaces generally tend to have the least possible maintenance and upkeep, but the highest initial cost by a significant margin. They are easy to fill but can freeze if the grade isn't steep enough (due to the pooling of surface water), causing it to degrade at a much faster rate.

While this material is the most compliant, high cost, risk of high rates of degradation (due to grade and proximity to Cranberry Lake) and typically unrealistic life of the material (due to general humid and wet weather conditions in the area) makes this option expensive.

#### **Alternative 2 – Shredded Rubber**

Shredded rubber could fill in the base of the playground. While shredded rubber isn't ADA compliant to the highest possible degree, it still fulfills the majority of ADA compliance aspects, including falls up to 10 feet (Marshall, 2011). Maintenance is very low, but high temperatures can cause a gas-off, and the material tends to get everywhere, lowering the aesthetic value of the area. While there are no protected wetlands in the area surrounding the Cranberry Lake Campground that are at risk, rubber being able to get into the Cranberry Lake could potentially cause negative environmental impacts such as heavy metals leaching into the water and soil surrounding the lake.

#### Alternative 3 – Wood Chips

Wood chips, while not rated at the highest ADA level, are a relatively inexpensive alternative as a playground surface. They are approved for falls up to 10 feet (Marshall, 2011), and are inexpensive as an initial cost. The main problem with wood chips is the maintenance – they must be maintained constantly to ensure that they don't decompose. Especially in an area with a humid and hot climate in summers, this can be a problem, as decomposing will likely be quicker than other places. The drainage is also poor, which could prove problematic in an area close to large bodies of water and prone to high rates of rain. Aesthetically, they do fit in with the rustic idea of the Adirondack Park.

#### Alternative 4 – Artificial Grass with Rubber infill

This alternative, along with the poured rubber is the most satisfactory in terms of ADA compliance. The creation of an artificial turf is an expensive option, however, and does not blend in with the rustic qualities outlined in the management of Intensive Use Areas designated in the initial Unit Management Plan for the site. However, the grass will likely not displace the same way normal loose shredded rubber would and would degrade much slower than the other ADA compliant rubber – the turf however is at risk for bacterial diseases like MRSA if not taken care of properly.

#### Alternative 5 – No Surfacing

This alternative is to not surface at all the playground area. Not only does this not satisfy the ADA standards, it also is dangerous. Unkempt grass can hide ticks and other animals, and things like large stones, rocks, and animals could impede proper play in the playground area. This as an alternative is untenable with the building of a new playground meant to be accessible.

#### Alternative 6 – Rubber Mats / Tiles

This alternative is the use of rubber mats or tiling to surface the area on which the playground will sit. While the most expensive option, it provides the biggest benefit in ADA compliance, safety, maintenance, and leaching threat. The rubber mat allows for low maintenance, and falls up to 12 feet (Marshall, 2011). It is also one of the few

materials that follows ADA compliance fully, allowing for the greatest accessibility. Since it is one large piece of rubber as well, off-gassing is not as much an issue as the shredded rubber, and there is no danger of it getting everywhere.

### **Alternatives Analysis Conclusion**

This alternatives assessment evaluated the feasibility of all known potential opportunities to achieve the stated project goals of ADA compliance, prevention of environmental degradation, and aesthetics as follows:

Alternative 1: Poured Rubber

Alternative 2: Shredded Rubber

Alternative 3: Wood Chips

Alternative 4: Artificial Grass with Rubber Infill

Alternative 5: No Surfacing

Alternative 6: Rubber Mats / Tiles

The preferred alternative was selected based on several factors, including:

- Effectiveness of achieving stated project goals
- Project site is held to the highest possible ADA standards
- Future disturbance of surrounding site is unlikely
- Safety from falls for playground users
- Cost / benefit analysis in terms of initial cost and maintenance
- Minimization of environmental impacts and blending with the surrounding environment

Rubber Mats / Tiles meet more of these factors than any other alternative – and as such, is the conclusive choice for this project.

### **Selection of Location and Analysis Conclusion**

#### **Alternative 1: Location adjacent to Cranberry Lake**

The first alternative location for the new playground is close to the water, in the day-use area adjacent to the beach. This is a core area for both campers and day users to gather. Access to many other facility amenities is in proximity making this an appealing location for a playground. There would not have to be new vegetative clearing for this location, however topographic alterations would be required. A primary concern with this alternative is the proximity to the waterfront. The Master Plan requires new structures located on the shorelines of lakes be set back a minimum of 150 feet from the mean high water mark. In addition, new structures located on shorelines must be reasonably screened from the water. These guidelines are for the purpose of maintaining a natural shoreline for visitors. Being close to the beach, anyone who wants an unimpeded view of the lake from the day-use area would have to contend with this structure. This alternative would add to the development of the shoreline and affect those on the lake looking towards the day-use area. Ensuring the natural character of the shoreline is a condition the Department is seeking to attain.

Alternative 2: Location near campground loops

The second alternative location for the new playground is inside one of the camping loops for easy access for campers. This would most likely be in camping loop V, as it has the most adjacent campsites for maximum use.

Loop 1: 23

Loop 2: 24

Loop 3: 21

Loop IV: 16

Loop V: 27

Loop V is also in walking distance from Loop 1 and parts of Loops II and IV. While this location is relatively centralized to the campsites, it could potentially alienate day-use visitors as well. Based on location, the playground could put undue stress on the facility and campers as whole. Putting it in a camping loop area creates new traffic, and in an area with high amounts of pedestrians could prove dangerous as well as put stress on the camp roads. Additionally, to accommodate this new playground, vegetative clearing would have to be undertaken to build a new parking lot and the playground itself. An increase in population surrounding the playground would also put high stress on the restrooms and likely necessitate a renovation of local restrooms and septic systems to deal with the increase in visitation to the camping loop. As a result of this, this alternative should not be as prioritized as others.

Alternative 3: Location in existing parking lot area

The third alternative location is in the older portion of the parking lot that is set to be repaved, where the amphitheater used to be located. In that area, there is already a basketball court and volleyball court, and it is located in close proximity to the day-use area. The existing pavement works well for rubber matting and tiling and would not need to be replaced for the playground to be built on top of it. Vegetative clearing and topographic alterations would be minimized as a result of this placement as well. The area is slightly sloped as well, and as such, poses no real issue for drainage, meaning maintenance would be minimal. The area is also located behind trees, meaning that it would not provide any visual impacts to the area. This project looks to utilize already existing infrastructure and building locations so that the view is not impeded. It also is situated near other day-use structures towards the front of the park, meaning it will see a good deal of use throughout the season. Because of the location as well, it can't be easily seen from the beach or water, posing no serious detriment to the rustic character of the campground and the Adirondack Park as a whole.

**Location Alternatives Analysis Conclusion**

This alternatives assessment evaluated the feasibility of all known potential opportunities to achieve the stated project goals. The goals in mind are for the structure to be low maintenance, high usage, and low initial cost. Low vegetative clearing / topographic alterations, and aesthetics were also considered goals.

Alternative 1: Location adjacent to Cranberry Lake

Alternative 2: Location near campground loop

Alternative 3: Location near already existing parking lot area

Based on the stated project goals, alternative 3 is the suggested way forward through this project. Utilization of already existing day-use areas, minimal natural characteristic harming, low maintenance and location make this the most appropriate and clear answer for a location for this playground.

### **Selection of Playground and Materials**

In terms of playground construction, a large playground made with natural materials such as cedar wood is the most appropriate for the area. These playgrounds are large enough for a day-use area and made almost entirely of natural materials to blend in better with the rustic character of the Adirondack Park. Both Lincoln Pond and Meacham Lake Campgrounds (see appendix) have playgrounds in this style and are also DEC managed campgrounds within the Adirondack Park.

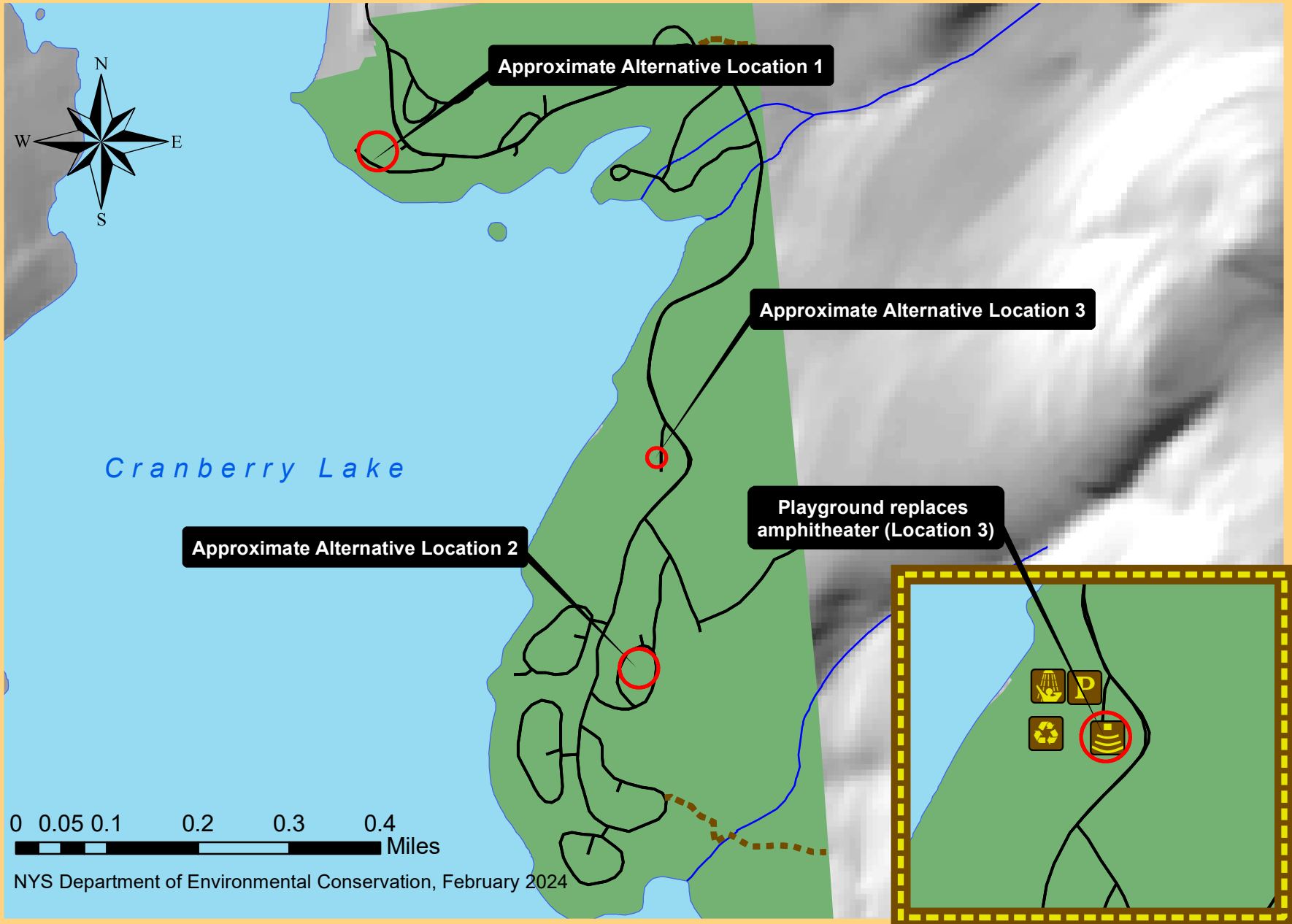
### **Facility Maintenance and Construction**

The construction and maintenance of this playground facility is outlined as such:

1. Site leveling, according to proper installation requirements of accessible surfacing. Minimal with existing pavement.
2. Minimal initial high pruning considering placement and best management practices.
3. Playground structure to be installed by contractor under supervision of the department.
4. Playground will be inspected and maintained according to department policy.
5. Accessible aspects will be inspected for compliance annually by ADA coordinator.
6. Area will be patrolled daily for general maintenance such as garbage removal, damage to structure / surfacing and cleanliness.



# Cranberry Lake Campground Playground Location Map



# Cranberry Lake Campground Playground Location



Approximate location of playground

0 100 200 400 Feet

NYS Department of Environmental Conservation, February 2024



# Cranberry Lake Campground Playground Photodeck



NRP/JNP Stage

Parking lot intended use area for playground



Recreation Structures



Parking lot intended use area for playground



Recreation Field





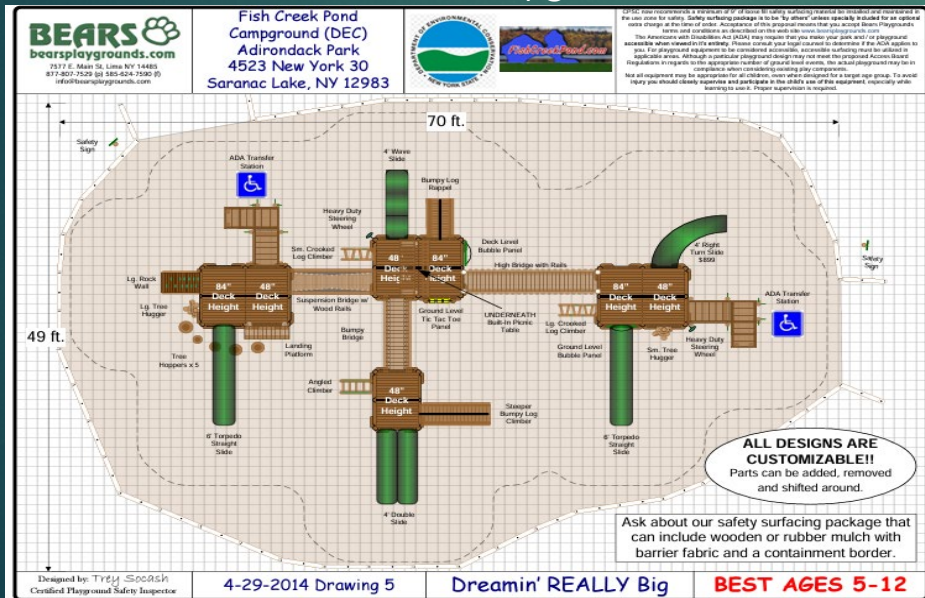
# Design Specifications



Frontier Town Playground Mats



Lincoln Pond Playground



Fish Creek Playground Blueprints



Meacham Lake Playground



## **Exhibit 18: Response to Public Comments**

The Department and the Adirondack Park Agency (APA or Agency) held a concurrent public comment period from May 16 through June 17, 2024. During that time, three written comments were received. Members of the public were not limited to one form of comment or from submitting multiple responses. In addition, some comments were submitted on behalf of organizations or user groups representing many members. All comments regardless of type will be reviewed and considered as the final UMP amendment is prepared.

In summary, a majority of comments were against the proliferation of plastics into the Adirondack Park environment. One comment was against the creation of any new infrastructure within DEC owned campgrounds in the Adirondack Park. The Department's response to comments is grouped by each theme below.

### **Public comments regarding the State Land Master Plan (SLMP) and Generic Environmental Impact Statement (GEIS)**

**Summarized Public Comments:** A comment was received regarding the constitutionality and master plan conformance of any campground infrastructure expansion in the Adirondack Park. Commenter expressed concern over the addition of a playground and instead encourages children go for nature walks, fish, swim, canoe and run around in the woods with their parents.

Another comment received stated “[t]he campground now has over 150 sites, for a total of 171 campsites, in violation of the SLMP. The campground must be “rehabilitated and reconstructed” to ensure that it and all of its facilities have the minimum adverse impact possible on surrounding state lands.”

**DEC Response:** As noted in the proposed UMP amendment, DEC proposes to add a playground to an established campground which will, “conform aesthetically to guidelines related to Intensive Use Areas, natural materials such as cedar logs, mortise, and tenon joinery will be attempted to be used in the construction of the project. Once implemented, the playground will complement the environment and contribute to the preexisting rustic feel of the campground and surrounding natural area. The goal of this amendment is to allow for a playground that benefits the recreation of campers while still maintaining the primitive aesthetic important to the Adirondack Park.”

In accordance with the APSLMP, family group camping and similar outdoor recreational pursuits are allowed so long as they are in a setting and on a scale in harmony with the “relatively wild and undeveloped character of the Adirondack Park.” Construction and development within Intensive Use Areas must also avoid wetlands, minimize extensive topographic alterations, limit vegetative clearing, and preserve the scenic, natural, and open space resources of the Intensive Use Area.

Consistent with the wild forest character of the intensive use campground, the playground location was chosen in an existing cleared area which obviates the need to cut any trees and will require minimal topographical alterations. Additionally, this playground will be designed to meet

ADA accessible standards, allowing for expanded access to the forest preserve for individuals with disabilities and their families.

Specifically, section III (2B) part e. of the General Environmental Impact Statement (GEIS) allows for “rustic playground equipment [...] on a campground case basis. This policy fits under ongoing objectives, where practical to carry out a program which meets user needs and desires and encourages new park entries and visitor returns”.

Section IV (8) of the GEIS references objectives pertaining to general operations, “to carry out a program which meets user desires; encourages park entries and returns by development of nature trails, playgrounds, picnic pavilions [...]”.

Section V (8) of the GEIS references that other campground locations will be inventoried and scheduled for installation of playground equipment as may be appropriate [...] generally consist[ing] of 3-4 pieces.

Section V (C) of the GEIS also references that impacts on wetlands will be avoided by engineering design precautions to not alter or infiltrate wetlands – site specific UMPs will provide analysis on this. This section explicitly references playground as a structure involved in this process.

Supported by the above materials, playgrounds are conforming structures as exhibited by APA Board approval of the Campground Generic Plan 1990 GEIS, provided that the impacts to wetlands are not large and the rustic quality of the playground is preserved. It is important to note that Cranberry Lake is one of only three campgrounds in all of DEC’s Region 6 and provides an invaluable opportunity for the public to experience camping in the Forest Preserve.

**APA Response:** The Agency appreciates this feedback and offers the following.

Although the APSLMP lists permitted structures and improvements for more restrictive classifications such as Wild Forest, the APSLMP does not list conforming structures or improvements for IUAs. However, the 1990<sup>[OBJ:OBJ]</sup> Unit Management Plan and Environmental Impact Statement for Campgrounds and Day-Use Areas Volume I (GEIS) does. <sup>[OBJ:OBJ]</sup>The GEIS states “DEC operated public campgrounds and day-use areas which have been inventoried, in this generic UMP document, demonstrate that classified intensive use areas afford to the public an opportunity for: family group camping; organized swimming; access to waterways for boating and fishing; non-consumptive and consumptive use of wildlife resources; facilitate hiking; **selective use of rustic playgrounds**, exercise courses, nature trails, and sports center areas; and picnicking” (GEIS at 67). The GEIS also proposes the management objective to “[c]arry out a program which meets user desires; encourages park entries and returns by development of nature trails, **playgrounds**, picnic pavilions, bike paths, exercise courses, sports centers, attractive entryways, and amphitheaters” (GEIS at 71). Finally, when describing the proposed management action for playgrounds the GEIS states “[c]hildrens **playground** equipment has been made available at some campgrounds for a number of years. Such locations will be inventoried for replacement as appropriate, with equipment of a more rustic design and fitting for the nature of DEC operated campgrounds. Other campground locations

will be inventoried and scheduled for installation of playground equipment as may be appropriate." (GEIS at 78).

It is staff's opinion that the draft UMPA is consistent with the guidelines set forth in the APSLMP for IUAs and with the 1990 GEIS for Campgrounds and Day-Use Areas. The proposed rustic playground structure consists mainly of natural materials to the greatest extent possible, uses natural colors, and is designed to blend with the relatively wild and undeveloped character of the Adirondack Park. An alternatives analysis is provided in the UMPA detailing the DEC's decision to utilize rubber mats/tiles as the preferred surface material. Furthermore, the proposed playground location consists mainly of an existing paved parking lot and amphitheater. Proposed construction activities avoid material alteration of wetlands, require no extensive topographic alterations or tree cutting, and will utilize existing developed areas to preserve the scenic, natural and open space resources of the IUA. Finally, the proposed location of the playground is set back greater than 150 feet from the mean high-water mark of Cranberry Lake and is reasonably screened from the water body avoiding intrusion on the natural character of the shoreline and the public enjoyment and use thereof. The following UMPs include playgrounds of a similar nature and have been approved by the Agency: Fish Creek Ponds, Ausable Point, Rollins Pond, Hinckley, and Meacham Lake.

The APSLMP does not mandate closure of campsites or the campground as a whole. The Cranberry Lake facility was opened prior to the adoption of the APSLMP in 1972. On page 43, the APSLMP reads "[t]he maximum size of *future* campgrounds in the Park will be in the range of 75-150 individual camping sites depending on site constraints, resource considerations and impacts on nearby lands."

### **Public comments regarding plastics in the construction of the playground**

**Summarized Public Comments:** Two comments were received regarding the construction of the playground using rubber mats as an ADA compliant base for the playground. These comments included a great deal of scientific literature on the detrimental impacts of plastics and microplastics to the human body.

**DEC Response:** As an agency responsible for environmental conservation, sustainable construction is something DEC takes seriously. When damaged or at the end of its useful life, any plastic or other materials will be removed for disposal, minimizing the impact of microplastics on the local environment. This, however, is in conjunction with the 2019 Climate Act and Climate Mitigation Efforts on Forest Preserve Lands (CLCPA) that states that new recreational infrastructure should be able to withstand extreme weather conditions, namely rainfall, in combination with heavy use. The structures need to be designed in a way that reduces annual maintenance resulting from these high use and rainfall events.

Plastics can have many negative impacts on the human body through long term exposure. It is with this in consideration that the playground will utilize natural materials to the greatest extent practicable. As noted earlier in the response to comments, the APSLMP requires both campgrounds and infrastructure to be of a wild forest or rustic character and require wood

structures. The playground itself will be built almost entirely of these materials, including cedar logs, mortise, and tenon joinery. This will complement the environment and contribute to a rustic feel of the campground and surrounding natural area much more than a traditional modern plastic and metal playground. Utilization of a predominantly wood structure and minimal plastic or metal features make great strides to that end. That said, with construction of any playground, as with many other public buildings and amenities, DEC must ensure ADA standards are met, meaning DEC cannot use historically utilized base materials like woodchips. Future maintenance costs and staff time commitment also must be considered. In addition, woodchips, and other natural base materials, can create a breeding ground for bacterial infections and painful falls through the deteriorating condition of the woodchip base. Rubber mats, while plastics, require extremely low maintenance, don't cause off-gassing, have high fall protection, and promote ADA accessibility. The playground itself will be made almost entirely of natural materials, and as a result most time spent on the playground will likely be on the playground itself, and not on the rubber mats.

DEC has also investigated alternatives like Engineered Wood Fiber (EWF) solutions proposed in comments received by DEC. It is through research of this alternative that it was found that EWF contains polyurethane, and as a result is not free of plastics and petroleum. Using EWF would also require significant additional excavation to install a full drainage system and drainage that would contain polyurethane to another part of the environment. This would create not only a significantly larger scale to the project, but also would create a secondary negative environmental impact. The geotextile matting underneath the EWF would also contain plastics in it. Historically woodchips were an obvious solution but due to playgrounds falling under the ADA, they are no longer a viable base material in the construction of playgrounds.

In all, plastics exposure is something DEC takes seriously. However, the minimal exposure to the mats together with the almost wholly naturally constructed playground itself is not cause for concern and does not outweigh the benefit to campsite visitors and communities local to Cranberry Lake Campground who can use the playground.