

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: ccowan6275@gmail.com
Subject: APA Project 2025-UMP02 Public Comments
Date: Monday, September 8, 2025 2:25:22 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to SLMP_UMP_Comments@apa.ny.gov.
Please copy "2025-UMP02, Christopher Cowan, ccowan6275@gmail.com" into your message for our reference.

Attn: Megan Phillips
Comments from: Christopher Cowan
Email from: ccowan6275@gmail.com
Address: 17 E Beacon St Glens Falls NY 12801
Re: Agency Project 2025-UMP02, NYSDEC - Luzerne Campground

My Comments:

I have camped at Luzerne campground a couple of times. The camp site were nice and well maintained. The camp rules as viewed on Reserve America such as personal generator run times are not enforced. The public restrooms are outdated and not well maintained and not clean. I did not use the public showers. When I used the public restroom it was much like using an outhouse with running water. Cob webs everywhere. It looked like someone may have taken a garden hose and sprayed the entire room and called that clean. I use DEC and state campgrounds often. This is one of the worst. Take a look at Cranberry Lake campground. That's how you do it. No sense in reinventing the wheel.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: Jane.Oppenlander@gmail.com
Subject: APA Project 2025-UMP02 Public Comments
Date: Monday, September 15, 2025 10:40:00 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to SLMP_UMP_Comments@apa.ny.gov.
Please copy "2025-UMP02, Jane Oppenlander, Jane.Oppenlander@gmail.com" into your message for our reference.

Attn: Megan Phillips
Comments from: Jane Oppenlander
Email from: Jane.Oppenlander@gmail.com
Address:
Re: Agency Project 2025-UMP02, NYSDEC - Luzerne Campground

My Comments:

This is to request that boat wash stations be installed as part of the management plan. Fourth Lake is a part of a chain of lakes and aquatic weeds (specifically Eurasian Watermilfoil) can be brought to Fourth Lake and transit to other downstream lakes in the chain.

In addition, this is to request appropriate signage and educational material be provided regarding boat washing (Clean, Drain, Dry), invasive species (both terrestrial and aquatic) and harmful algal blooms, avoiding movement of firewood, etc.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: pngold44@gmail.com
Subject: APA Project 2025-UMP02 Public Comments
Date: Wednesday, September 3, 2025 4:36:57 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to SLMP_UMP_Comments@apa.ny.gov.
Please copy "2025-UMP02, Patricia Goldberg, pngold44@gmail.com" into your message for our reference.

Attn: Megan Phillips
Comments from: Patricia Goldberg
Email from: pngold44@gmail.com
Address: 9 Hillcrest Drive
Re: Agency Project 2025-UMP02, NYSDEC - Luzerne Campground

My Comments:

Please install boat washing stations on both beaches to help control invasives. Also, please give campers information on the need to control invasives in the lake. Thank you.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: pngold44@gmail.com
Subject: APA Project 2025-UMP02 Public Comments
Date: Sunday, September 14, 2025 12:59:53 PM

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

***** PLEASE NOTE *****

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to SLMP_UMP_Comments@apa.ny.gov.
Please copy "2025-UMP02, Patricia Goldberg, pngold44@gmail.com" into your message for our reference.

Attn: Megan Phillips
Comments from: Patricia Goldberg
Email from: pngold44@gmail.com
Address: 9 Hillcrest Drive Lake Luzerne NY 12846
Re: Agency Project 2025-UMP02, NYSDEC - Luzerne Campground

My Comments:

There are people who go ice fishing on Fourth Lake during the winter. Ice augers can spread invasive species and as far as I know no one is available to monitor the lake in the off season. Therefore, I would request some sort of signage urging fishermen to clean their agers before and after each use.

Thank you.



Board of Directors

Charles Clusen
Chair

Barbara Rottier
James McMartin Long
Vice-Chairs

Chris Walsh
Secretary

David Quinn
Treasurer

Nancy Bernstein
John Caffry
Dean Cook
Juliet Cook
James C. Dawson
Lorraine Duvall
Robert Glennon
Roger Gray
Sidney Haring
Michala Hendrick
Sheila Hutt
Patricia Morrison
John Nemjo
Charlie Olsen
Peter O'Shea
Philip Terrie

Staff

Claudia K. Braymer, Esq.
Executive Director

Christopher Amato, Esq.
**Conservation Director
and Counsel**

Peter Bauer
Fundraising Coordinator

September 15, 2025

Oliver Miller
NYS DEC
Division of Operations
625 Broadway
Albany NY 12233-5253

Megan Phillips
NYS APA
Deputy Director for Planning
PO Box 99
Ray Brook NY 12977

**Re: Draft Luzerne Public Campground and Day-Use Area Unit
Management Plan**

Dear Mr. Miller and Ms. Phillips:

Protect the Adirondacks has reviewed the draft Luzerne Public Campground and Day-Use Area Unit Management Plan (UMP) amendment, which was noticed in the Environmental Notice Bulletin on August 13, 2025. We appreciate the opportunity to review and comment on this draft UMP.

As discussed below, the draft UMP fails to bring the Luzerne campground into full compliance with the requirements of the Adirondack Park State Land Master Plan (SLMP) and the proposal to construct a new playground does not comply with the SLMP.

The Forest Preserve Campgrounds are of Questionable Constitutionality

First, we want to note that the constitutionality of campgrounds with respect to Article 14 of the Constitution, the Forever Wild clause, has been a matter of historic controversy. During the 1967 Constitutional Convention, one delegate, Judge Charles Froessel, a retired Court of Appeals judge, argued that campgrounds were unconstitutional and that Article 14 needed to be amended to legitimize their existence. He argued for Article 14 to be amended to explicitly permit: "the construction, maintenance and operation of recreational campsites [Campgrounds] bordering on or in the vicinity of state or county highways with necessary

Protect the Adirondacks

PO Box 48, North Creek, NY 12853 518.251.2700

www.protectadks.org info@protectadks.org

Like Us on Facebook and on Instagram/Threads @ProtectAdkPark

access, water supply and sanitation facilities, all of which shall be in keeping with the surrounding areas.”¹

Delegate Froessel stated that the Conservation Department (DEC’s predecessor agency) had “stretched the constitution and they have erected not only within the Adirondack Park system, but within the blue line, at least 40 campsites during the last three or four decades. There is no basis in law for their having done that. . . . Now, I am not criticizing the commissioners in the past for doing this But at least there should be a legal foundation for it.”² He also noted that the editor of the Conservation Department’s *Conservationist* magazine admitted that concentrated campsites (now campgrounds) “are certainly of doubtful constitutionality”.³

Several arguments were made in opposition to the proposed constitutional amendment, including that the “forest preserve does not and is not intended to supply every recreational need. The ball fields, the bowling alleys and the developed facilities are elsewhere”.⁴ The proposed amendment was not approved by the delegates. As a result, the campgrounds and “developed facilities” that DEC continues to construct and manage have not been authorized in the Constitution.

The UMP Fails to Bring the Luzerne Campground into Compliance with the SLMP

The SLMP directs that “[t]he primary management guideline for intensive use areas will be to provide the public opportunities for family group camping, developed swimming and boating, downhill skiing, cross country skiing . . . visitor information and similar outdoor recreational pursuits in a setting and on a scale that are in harmony with the relatively wild and undeveloped character of the Adirondack Park.” SLMP at 41.

The SLMP’s Guidelines for Management and Use of Intensive Use Areas include:

1. Providing opportunities for camping “in a setting and on a scale that are in harmony with the *relatively wild and undeveloped character* of the Adirondack Park”.
2. “All intensive use facilities should be located, designed and managed so as to *blend with the Adirondack environment* and to have the minimum adverse impact possible on surrounding state lands and nearby private holdings”.
3. “Construction and development activities . . . will . . . preserve the scenic, natural and open space resources of the intensive use area”.
4. “All campgrounds will be of a *rustic nature without . . . elaborate facilities . . .* All facilities and appurtenances are to be *constructed of natural materials* to the fullest extent possible so as to blend with the natural environment”.
5. “The maximum size of future campgrounds in the Park will be in the range of 75 to 150 individual camping sites”.

¹ Proceedings of the Constitutional Convention of the State of New York, April fourth to September twenty-sixth, 1967. 12 vols, consecutively paginated. Available online at the New York State Library: <https://nysl.ptfs.com/#!/s?a=b> (go to Government Collections, New York State Constitutional Conventions, 1967, Proceedings, Volume 2, page 542).

² *Id.*

³ *Id.*

⁴ *Id.* at 543; see also *Association for the Protection of the Adirondacks v. MacDonald*, 253 N.Y. 234, 242 (1930) (manmade sporting facilities not permitted on the Forest Preserve).

6. “The *older, existing campgrounds* will be rehabilitated and reconstructed . . . to reflect modern site planning principles that will better blend the facilities with the environment and *comply with the provisions of [the SLMP]*”.

SLMP at 42-43 (emphasis added). The draft UMP does not comply with these key provisions of the SLMP in the following respects:

The Number of Campsites Must be Reduced

DEC management of the Luzerne Campground began in 1960’s, prior to the enactment of the SLMP, so the original campground was not planned to comply with the SLMP’s provisions governing Intensive Use areas. The campground now has 173 campsites, in violation of the SLMP’s limit of no more than 150 allowable sites. 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”. SLMP at 42-43.

We support DEC’s plan to select sites for temporary closure for the purpose of rehabilitating them to reflect modern planning and construction and to better blend them into the surrounding environment. In addition to closing individual campsites with problems that cannot be reasonably addressed, the UMP should state that DEC will select approximately 75 sites to close in order to reduce the number of sites at the campground to bring it into compliance with the SLMP’s limitation on the number of sites.

The Proposed Playground Must be Eliminated from the UMP

Protect the Adirondacks strongly supports introducing children to the natural wonders of the Adirondack Park. However, a manufactured playground is not appropriate or necessary for the public to enjoy the wild forest nature of the Forest Preserve.⁵ There are a multitude of other activities such as hiking, fishing, swimming, and canoeing that allow direct contact with and experience of the Forest Preserve. We believe that the playground is likely to receive little to no visitor use and would eventually need to be removed in the same manner that the existing volleyball court receives little use and is now being proposed for removal. Private campgrounds offer playgrounds for families that want that amenity.

Moreover, as discussed below, there are serious constitutional and SLMP issues posed by the draft UMP’s proposal to construct a new playground at the Luzerne campground.⁶ Consequently, we urge DEC and APA to withdraw the proposal to add this manufactured amenity to the Forest Preserve.⁷

⁵ *Association for the Protection of the Adirondacks v. MacDonald*, at 241.

⁶ The UMP’s comparison to the Lincoln Pond Campground is inappropriate since there is not an approved UMP authorizing the campground or the playground at that location (indeed the UMP for that area is currently under development). DEC has previously noted (in the Limekiln Lake Campground UMP, in responses to public comments) that the idea of constructing a playground is problematic because “[r]egulations regarding playground design, maintenance and safety requirements are quite rigorous and discourage the construction of small playgrounds in campgrounds”.

“Improving recreation and the use and enjoyment of the preserve are laudable aims, but they were insufficient in [*Association for the Protection of the Adirondacks v.*] *MacDonald* to obviate the need for a constitutional amendment.”⁸ Accordingly, DEC is crossing a legal boundary by constructing more manmade amenities and facilities within State-owned campgrounds, which themselves are of questionable Constitutionality. Therefore, the proposal to construct a new playground at this campground should not be approved in the UMP due to constitutional constraints.

Significantly, the SLMP does not list playgrounds as an allowed facility within Intensive Use Areas. In fact, the SLMP states that “more intensive recreational and service facilities” are more appropriately located on private lands, which allow “a broader spectrum of recreational opportunities”. SLMP at 3. The SLMP also specifically states that the “economic viability of these private facilities should be a major concern in the development of pricing and operating policies for state intensive use areas”. *Id.* To avoid competing with private campgrounds, and because playgrounds are not authorized in the SLMP, DEC should not construct a playground in a campground on the Forest Preserve.

We also note that many, and perhaps most, of the existing campgrounds on the Forest Preserve do not have developed playgrounds such as the one proposed for the Luzerne Campground. Playgrounds have little, if any, relationship to “opportunities for family group camping, developed swimming and boating ... and similar outdoor recreational pursuits in a setting and on a scale that are in harmony with the relatively wild and undeveloped character of the Adirondack Park.” *Id.*

The proposal to construct a manufactured playground, however well-intentioned, violates the SLMP’s Guidelines for Management and Use of Intensive Use Areas because it is not consistent with the relatively wild and undeveloped character of the Forest Preserve, it does not blend with the Adirondack environment, it is not of a rustic nature and is more elaborate of a facility than is authorized by the SLMP. Moreover, the proposed rubber or artificial grass playground surface, plastic slides, and metal parts of swings and playground equipment are not natural materials. *See* SLMP at 42-43.

Thus, the proposed playground should be withdrawn because it will violate the provisions of the SLMP and further exacerbate existing SLMP violations.

The Campground Roads Should be Unpaved

Rather than resurfacing the six miles of campground roads with new pavement as proposed in the UMP, the asphalt should be removed and the roads resurfaced with dirt or gravel. Asphalt paved roads are impervious surfaces that add pollutants to stormwater runoff, are not in harmony with the undeveloped character of the Adirondack Park and do not blend with the Adirondack environment as required by the SLMP. SLMP at 42-43.

Food Waste Should be Composted

⁸ *Protect the Adirondacks! Inc. v. New York State Dep't of Env't Conservation*, 37 N.Y.3d 73, 84 (2021).

The recycling and disposal facility should include a means of collecting food waste separate from the rest of the solid waste. The Luzerne Campground is located in Warren County, which is developing a composting facility (partially funded by a DEC grant⁹) that will reduce the amount of food waste going to the Wheelabrator Facility in Hudson Falls where waste from this campground is incinerated. Alternatively, DEC could contract for the transportation of food waste to another compost facility. Allowing this campground's visitors to compost food waste will meaningfully reduce the amount of waste being combusted, and will support the Values and Vision in New York State Solid Waste Management Plan.¹⁰

Electric Vehicle Charging Station Should be Included

As part of the process of replacing the overhead power lines with an underground system, the UMP should provide for the addition of one or more electric vehicle charging stations to one of the existing parking areas.

Remove Volleyball Court and Ball Field

We support the UMP's proposal to remove the current volleyball court and to remove the recreational ball field (known as the Field of Dreams). Neither a volleyball court nor a recreational ball field should be located in a DEC campground in the Forest Preserve.

Plant Trees and Shrubs

We support the UMP's proposal to plant native trees and shrubs throughout the campground on an ongoing basis. We also support the UMP's proposal to plant trees and shrubs in the recreational ball field.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on this draft UMP.

Sincerely,



Claudia K. Braymer
Executive Director

cc: Joseph Zalewski, DEC Region 5 Director
Molly Breslin, Esq., DEC Office of General Counsel
John Caffry, Esq., Co-Chair, Protect the Adirondacks Conservation Advocacy Committee

⁹ <https://www.adirondackexplorer.org/stories/warren-county-composting-program>

¹⁰ <https://dec.ny.gov/sites/default/files/2024-05/finalsswmpmainplan20232.pdf>

Luzerne Campground Unit Management Plan Public Comment Survey

4 Responses 09:09 Average time to complete Active Status

1. Replacement of the Restrooms

Strongly Agree	2
Agree	1
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0



2. Rehabilitation of the Campground Roads

Strongly Agree	2
Agree	1
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0



3. Rehabilitation of the Kiosks, Trails, and Barn in the Equestrian Area

Strongly Agree	2
Agree	1
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0



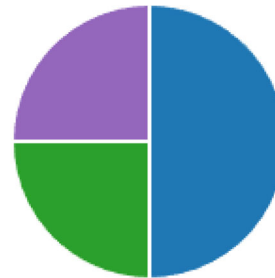
4. Rehabilitation of Water Systems

Strongly Agree	2
Agree	1
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0



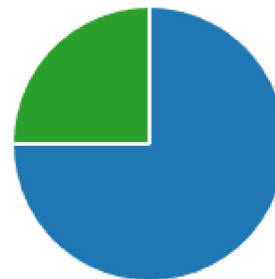
5. Replacement of the Overhead Electric Lines with Underground System

Strongly Agree	2
Agree	0
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	1



6. Addition of Utility Sinks to all Restrooms

Strongly Agree	3
Agree	0
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0



7. Plantings of Trees and Shrubs

Strongly Agree	3
Agree	0
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0



8. Removal of Boat Launch Northeast of Day Use Area

Strongly Agree	1
Agree	1
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	1



9. Replacement of Volleyball Court with a Playground and Pavilion

Strongly Agree	1
Agree	1
Neither Agree Nor Disagree	2
Disagree	0
Strongly Disagree	0



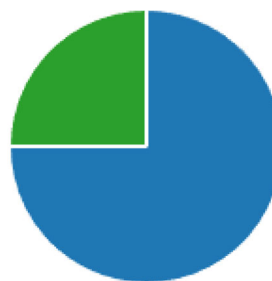
10. Bridge Reconstruction

Strongly Agree	2
Agree	1
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0

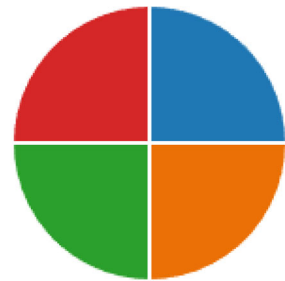
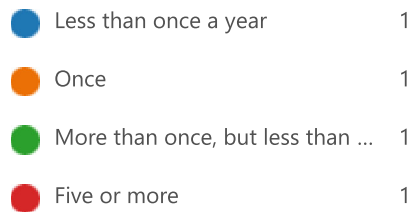


11. Restoration of Campsites

Strongly Agree	3
Agree	0
Neither Agree Nor Disagree	1
Disagree	0
Strongly Disagree	0



12. How many times do you visit this facility in a typical year?



13. What is your home zip/postal code?

4
Responses

Latest Responses

"12833"

"12846"

"12846"

14. Please provide any additional comments or proposals you would like us to consider:

4
Responses

Latest Responses

"I have camped at the Luzerne Campground since 1995 wit...

"We wrote this directly to the DEC and are attaching it her...

"I do not use the campground, which is why I have no opini...

