

June 4, 2021

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RE: Unit Management Plan Fish Creek Campground

This letter represents the Upper Saranac Lake Association's follow-up response and comments relevant to the UMP for the Fish Creek campgrounds in the town of Santa Clara.

Our initial response, dated September 30, 2020, is attached as reference to our previously stated concerns and comments regarding the proposed items within the UMP.

The Upper Saranac Lake Association (USLA) represents about 550 members, most of whom own property on the shores on Upper Saranac Lake, Fish Creek ponds and several ponds in the Saranac Inn area. The purposes for which the USLA corporation is organized are: to preserve, enhance and protect the natural beauties and environmental purity of Upper Saranac Lake, its adjoining waters and the adjacent lands and forests; to encourage and assist in improving the recreational enjoyment of these waters and lands without thereby degrading or deteriorating the natural environmental quality thereof, and generally to conserve and protect the interests of owners and tenants of the area embraced within the Upper Saranac Lake watershed. USLA is also actively engaged in improving boater safety and regularly provide boater safety classes.

We believe our organization and membership should participate, contribute and collaborate more effectively to fulfill our purpose, therefore in the summer of 2020 we expanded our Government Affairs Committee.

USLA members have substantial investments in private holdings that account for excess of 90% of the town taxes. Our membership also has invested heavily via donations to the Upper Saranac Foundation for the cleaning and maintaining of our waterway to actively control AIS infestation. While USLA members believe we have some responsibility for ensuring the control of AIS infestation, we also believe the existing UMP does not conform to the Adirondack Park State Land Master Plan. Specifically, to the "protection and rehabilitation of the area's

resources including the preservation of aquatic habitats." as well as "minimizing adverse impacts on surrounding state lands and nearby private holdings".

The revised UMP does not adequately address specific measures and strategies to hinder the spread of AIS. As example, the Fish Creek campsites have a single gated entryway, which could easily enable an inspection program of all boats entering the campgrounds. Additionally, any "boats of concern" should not be allowed to launch outside of active water steward inspection hours. While previously certified boats could be launched at any time.

Additional cleanup and maintenance of AIS is not an acceptable alternative to a lack of a management strategy that prevents new AIS introduction via an active inspection and cleaning program.

Once this program is implemented, it won't take long for campers to realize that their boats must be cleaned prior to being launched at Fish Creek campsites. They will learn to make time for cleaning onsite or stopping at the cleaning location on Rt 87 (Northway).

Providing a new boat launch with a high-pressure, hot water AIS decontamination station on-site would better enable the Stewardship Program to be successful. The decontamination station could also charge a fee to local lake owners, not staying at the campsites, to clean their boats. These actions would well position DEC at Fish Creek Campgrounds for the proposed changes in the revised NYS Invasive Species Transport Law.

USLA again strongly recommends that the DEC conduct a comprehensive capacity analysis for Fish Creek Ponds and the creek waterway to Upper Saranac Lake. USLA members are very concerned regarding: the boat traffic during summer peak periods; boat and PWC speeds near shorelines, swim areas and bridges; and, shore erosion causing trees to fall into the waterway. Additionally, with the anticipated increase in utilization due to the UMP improvements, combined with the owner proposed additional dock storage space at the former Hickok's marina, a comprehensive capacity analysis is crucial.

The negative impact of overloading degrades the overall experience for both campers and the local population. We ask that the DEC also recognize the substantial investment in maintaining the watershed

environment for all users made by campground neighbors and join USLA and the Upper Saranac Foundation in preventing AIS and in preserving, enhancing and protecting the natural beauties and environmental purity of Upper Saranac Lake.

USLA hopes that our recommendations, suggestions and concerns are not viewed as opposing DEC UMP development and progress but rather as collaborating as a stakeholder in enhancing and maintaining the wilderness character and pristine waters for future generations. It is essential that our business, residential, and State owned facilities coexist within our Adirondack community and maintain the delicate balance necessary for all to positively exist.

Thank you for considering our input and the opportunity to participate.

Regards,

Larry Koch President, USLA Dave Powalyk Vice President, USLA

CC: USLA Governmental Affairs Committee