## TOWN OF ARIETTA PO BOX 37, 1722 STATE ROUTE 8 PISECO, NY 12139

Mr Josh Houghton, NYS DEC Bureau of Recreation 625 Broadway Albany, NY 12233-5253 campinfo@dec.ny.gov OF AREA

Re: Draft Unit Management Plan (UMP) for Caroga and Piseco Lake Campgrounds

Dear Mr. Houghton,

The Arietta Town Board, Hamilton County, home to Piseco Lake, has reviewed the "Draft Unit Management Plan for Caroga & Piseco Lake Campgrounds". We would like to offer the following comments, suggestions and proposals:

Page 20, item 15, references a 2010 Court decision that ruled that the Town could no longer continue the practice of utilizing its dam to control the level of the lake during the summer months. In 2014 that court decision was overturned on appeal (Borst v International Paper Co, Supreme Court of New York, Appellate Division, Third Department, October 23, 2014, Decided; October 23 2014, Entered, 517299).

We would suggest that this section be updated to reflect the subsequent court decision which allows the Town to continue to operate the dam. Or, alternatively, omit references to both court decisions and simply identify the location of the dam and indicate that the Town controls the level of the lake to provide a stable water level during the spring and summer.

Page 38 of the UMP identifies "Proposed Management Actions". The actions listed include converting four Little Sand campsites to universal design. The actions listed do not mention conversion of any Point comfort campsites to universal design. However, DEC's "Campsite Restoration Plan" indicates that four Point Comfort campsites will also be converted to universal design during the 2017-18 season. Consequently, there is confusion regarding the actual plan for campsite availability during the 2017-18 season.

The list of proposed management actions also indicates that Little Sand will close some unspecified number of "....sites to improve camper experience" and Point Comfort will close an unspecified number to "...improve site separation". It would be helpful to know how and when this will affect capacity at both campsites.

Pages 40-41, item 8, lists four possible alternative uses for the Poplar Point campsite. The fourth, which is identified as the preferred, proposes to redevelop Poplar Point as "...a no-fee, day-use boat launch facility..." This alternative purports that "minimal staff" will be needed and that the parking area will be "improved". However, there is no definition or detail provided regarding what is meant by minimal staff or improved parking.

Operating the boat launch on a no-fee basis provides an incentive to use Poplar Point as an alternative to the two, other state operated, "fee for service" boat launches, on Piseco Lake. This may cause greater demand, than experienced in the past, for the limited, existing parking spaces at Poplar Point. In the absence of detail

regarding the improvements (expansion?) to the parking area, this is of concern. Poplar Point is located on CR24. Parking is not allowed on the CR24 roadway and the shoulders are minimal, not level, and/or nonexistent. Thus we have concerns that unsafe, illegal parking may occur if day users need additional parking spaces.

In regard to the reference to minimal staffing, we are concerned that the contemplated level may not be adequate. Specifically, will it be adequate to ensure that Poplar Point will be kept clean, that order will be maintained and parking will be supervised?

In addition to what is addressed in the UMP we are also concerned about issues which are not addressed. It is not clear about what potable water and sanitation facilities will continue to be available. We are concerned regarding what will be available for boaters, day users and also for our lake stewards. Poplar Point is where the Town would ultimately like to locate its boat decontamination station so accommodating our stewards, comfortably, is something we would like to plan for.

Additionally, the Town of Arietta has had intermittent conversations with DEC regarding town management and town use of Poplar Point. Indeed, "The Town of Arietta Comprehensive Plan" speaks to enhancing and maintaining our recreational resources. Toward that end, the comprehensive plan indicates that the Town will "negotiate with the State to allow the Town to own and/or manage....Poplar Point. The acquired land would be used for expanded public recreational purposes and public lake access."

Keeping both short and long term uses for Poplar Point in mind, the Town would propose that the UMP combine some of the elements of alternative 3 and alternative 4 as follows:

Provide regularly scheduled staff that would be able to keep the site clean, maintain order and ensure parking is done safely and consistent with capacity;

Expansion of the parking capacity, possibly into the area previously used for overnight camping;

Continue the availability and supply of sanitation facilities and potable water for day users;

Keep the Poplar Point supervisor's cottage or lifeguard cabin open and available to boat stewards;

Continue to periodically pump the septic tanks at the supervisor's cottage and/or the lifeguard cabin; and

Importantly, do not dismantle any of the infrastructures that are essential to the long term use of Poplar Point as a recreational day use area.

If, ultimately, the State and the Town agree to Town use and management of Poplar Point, responsibility for the above mentioned activities and resources would, of course, be subject to negotiation.

If clarification is needed on any of the points made, please do not hesitate to contact me at 548-3415. We appreciate the opportunity to comment.

VTY

Rick Wilt, Subervisor

Cc: Town Board members