PAUL SMITH'S COLLEGE
Adirondack Watershed Institute

Megan Phillips
Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

July 12, 2022

Dear Ms. Phillips,

I am a wildlife ecologist and the Science Director for the Paul Smith's College Adirondack Watershed Institute. My research in the park for the past 25 years has focused on the impacts of a variety of land use management practices on wildlife. I offer the following only to provide ecological context for your consideration of this and any other decision relating to roads in the Adirondacks.

It is difficult to overstate the ecological impacts of roads. Roads have profound influences on natural communities and numerous accounts of their impacts have been written (e.g., Spellerberg 1998, Trombulak and Frissell 2000, Robinson et al. 2010). Impacts to wildlife are documented for all manner of roads (Glennon and Kretser 2012) including small unpaved forest roads like those that characterize Wild Forest (Robinson et al. 2010), and traffic volume is often the most important predictor of the intensity of those impacts (Jaeger et al. 2005). My expertise is focused primarily on wildlife, but Gucinski et al. (2001) provide a comprehensive synthesis of scientific information relating to forest roads.

One of the most profound impacts of roads is the creation of edges. Edges are associated with a variety of biological and physical changes which impact wildlife species in the associated habitats (Hilty et al. 2006, Ahern 1995, Puth and Wilson 2001, Laurance et al. 2002, Ries et al. 2004). In forested areas, edges tend to be sunnier, warmer, drier, and more favorable to invasive exotic species, shade-intolerant plants, and generalist predators at the expense of many native species (Milder et al. 2008, Forman 1995, Harper et al. 2005). The spatial impacts of roads extend well beyond the areal footprint of the infrastructure itself. Sizes of edge effect zones vary widely depending on species and ecological context but have been found to be as large as 5000m (Robinson et al. 2010) and will vary depending on road usage and traffic. These effects are not limited to paved roads. There are potential population level consequences associated with the creation of new roads. Edges are likely to result in increased predation pressure on songbirds resulting from the use of new roads by generalist predators. Such impacts have been documented in numerous studies (Hickman 1990, Greenwood et al. 1995, Chalfoun et al. 2002, Frey and Conover 2006). This effect can sometimes result in what is known as an ecological trap – edges which offer attractive nesting locations and food resources but which also expose individuals to increased competition and predation, creating sink habitats where mortality and emigration are higher than replacement levels (Battin 2004).

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Apart from increased predation and potential attraction of wildlife to new edges, roads will cause direct mortality for a variety of species and will result in altered movement patterns for others. Amphibians and reptiles are likely to be especially vulnerable to road mortality (Fahrig et al. 1995, Gibbs and Shriver 2002) though population-level impacts are noted for a variety of vertebrate taxa (Kociolek and Clevenger 2009). Again, these impacts vary but are not limited to paved roads. Erickson et al. (2005) estimate 80 million fatalities of birds annually caused by collisions with vehicles. Other species are likely to change or restrict their movement patterns in response to new roads, which can result in altered community structures and, in the most extreme cases, reduced genetic diversity and/or genetic isolation (Mumme et al. 2000, Forman et al. 2003). Even small, unpaved forest roads have been shown to affect the movement of small-bodied species (Mader 1984).

There are numerous ways in which some of the potential negative impacts of new roads can be addressed. Both Robinson et al. (2010) and Glista et al. (2009) provide thorough treatments of the impacts of roads on wildlife and ways in which these might be assessed and mitigated.

With appreciation for your consideration of these comments,

Michale Glennon

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July 9, 2022

Megan Phillips, Deputy Director for Planning
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Sent via email to SLMP_UMP_Comments@apa.ny.gov

Subject: No Material Increase of Road Mileage on Wild Forest

Dear Ms. Phillips:

Thank you for the opportunity to comment on interpretation of the Adirondack Park State Land Master Plan (SLMP) guideline on Wild Forest road mileage. While I do not live within the park, I am a frequent visitor over the last 40 years.

It seems to me that the more germane issue with respect to Wild Forest is what limitations are necessary to keep Wild Forest wild. Additional roads in Wild Forest will result in an increase of motorized use, degrading the "essentially wild character" of Wild Forest areas. The SLMP recognizes this fact by stipulating "there will not be any material increase in mileage of roads."

A 15 percent increase in road mileage flies in the face of no material increase by any definition. If, as a result of this review, a percent increase is defined, it should be much, much less than 15 percent.

In conclusion, additional roads in Wild Forest should be prohibited (my preference), or severely limited.

Thank you for considering these comments.

Very truly yours,

Brian T. Fitzgerald

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July 11, 2022

Adirondack Park Agency
Attn: Megan Phillips
1133 Route 86
Ray Brook, NY 12977

Re: State Land Master Plan – Wild Forest Roads – No Material Increase Policy

Dear Ms. Phillips:

We are Counsel for Adirondack Association of Towns and Villages and Adirondack Park Local Government Review Board and submit these comments in reference to the Adirondack Park Agency's consideration of establishing a policy in reference to "no material increase" of roads in areas of Wild Forest land classification. These comments are summited on behalf of both AATV and APLGRB and we request that they be made part of the official public record on this issue.

We are uncertain as to exactly why this issue is now before the Agency for consideration but, regardless, AATV and APLGRB have a number of questions and comments as follows:

1. In light of the absence of explicit language governing this issue in the State Land Master Plan, we are somewhat concerned that Agency Staff may be somewhat predisposed toward severe restriction of future roads (and possibility even elimination of existing roads) in Wild Forest area. We clearly recognize the overall mandate to give high priority to conservation and preservation values in Wild Forest but, nonetheless, it is also critical to recognize that continued elimination of road access would have severely negative consequences for both recreational activities and economic vitality in and of our Adirondack communities.

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2. We are far from certain that the 14.7% (rounded to 15%) number derived from informal Agency policy now several decades old and originating in snowmobile trail calculations really has or should have much bearing on the present day road calculation issue. There is obviously no definition of "material" in SLMP or, as far as we are aware, any related documents. The 14.7%/15% policy itself seems to have been somewhat randomly derived without specific basis in law, rule or regulation and we do not really see any "magic" to application of that number in the non-snowmobile road context.

3. Agency Staff seems to indicate that the road calculations/tally took into account certain types of roads, but not others. More specifically, the list of tally criteria seems to indicate that public roads existing in Wild Forest in 1972 and since have been excluded from the calculation. This strikes us as an arbitrary exclusion, as such roads clearly meet the first of the three sub-definitions in the SLMP definition of road. We surmise that there are indeed many miles of public roads in Wild Forest classification areas and believe that the mileage of such roads must be included in the overall count and calculation. If as we understand the mileage of these roads is unknown, then further research must be undertaken to ascertain it.

4. In the context of this issue, CP3 roads are those for which individuals with disabilities have secured access through Temporary Revocable Permits. As far as we are aware, such TRPs are apparently currently held by approximately 1000 individuals in the entire State of New York which we believe is currently comprised of approximately 19.4 million individuals (permittees therefore constituting approximately 0.005% of the New York State population). One of the interpretation scenarios suggested by Staff would include all miles of CP3 roads despite the fact that such an infinitesimal proportion of New Yorkers have this access. We suggest that, under these circumstances, there is no rational legal, factual or practical support for inclusion of these roads in the overall calculation. We suggest that the Agency cannot rationally take the position that individuals holding CP3 TRPs constitute the "General Public" or that these CP3 roads are genuinely "open for public use".

5. We suggest that access to these CP3 roads via TRPs issued to individuals with disabilities is not in any manner subject to the discretion of the Department of Environmental Conservation. To the contrary, while these roads may be "owned, operated and/or maintained" by the Department in a manner of speaking, allowing access to individuals with disabilities is legally required by virtue of not one, not two but three sources of authority. First, such access is required for the State of New York to comply with the Federal Americans with Disabilities Act. Second, such access over at least some of the roads is required as a result of the Federal litigation case Galusha vs. State of New York, which was decided by Judge Lawrence Kahn in the U.S. Northern District Court in Albany in 1981. Finally, such access is also required, again to at least some of the roads, as a result of the subsequent settlement of that same Court case. As a result, CP3 roads cannot be considered roads for which DEC has the discretion to allow access or not and therefore should also not be part of the calculation.

6. In light of the above concerns, AATV and APLGRB respectfully request that the Agency hold any decision on this important issue in abeyance as further data is gathered in reference to the mileage on public roads in Wild Forest existing in 1972 and since. In addition, at such time if any that the Agency decides to visit this issue for decision-making, we respectfully suggest that such public road mileage be included in the calculation, while all forms of CP3 roads including both "Galusha" and "non-Galusha" roads be excluded from the calculation with an accompanying determination that the State is legally obligated to provide appropriate access to individuals with disabilities to these roads and that they therefore should not be counted or allocated "against" the Wild Forest road mileage total.

We thank Agency Members and Staff for consideration of our comments.

Very truly yours,

MILLER, MANNIX, SCHACHNER & HAFNER, LLC

Mark Schachner

MS/anc

cc: Adirondack Association of Towns and Villages
Adirondack Park Local Government Review Board
Chris Cooper, Esq., Adirondack Park Agency
Molly Breslin, Esq., New York State Department of Environmental Conservation

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July 12, 2022

Megan Phillips
Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977
(***Via Electronic Submission)***

RE: No Material Increase of Road Mileage on Wild Forest (Wild Forest basic guideline No. 4)

Dear Megan,

On behalf of the Adirondack Council, I would like to offer comments on the State Land Master Plan's Wild Forest Guideline No. 4. The Council appreciates the opportunity to provide comments on this language that has been murky since the State Land Master Plan (SLMP) was adopted 50 years ago. The No Material Increase (NMI) language in the Wild Forest guideline No. 4 should be interpreted in a way that acknowledges the motorized use roads are designed for, and the ecological and climatic impacts such uses have on the state land resources.

The Council supports and underscores the well-articulated legal and natural resource concerns raised in Adirondack Wild's comment letter. Below are the Council's comments for consideration.

Following the Boreas Ponds classification, APA and DEC underwent a rigorous land classification process. The Wild Forest Guideline No. 4 was raised as DEC navigated the Wild Forest classification for tracts that contained numerous logging roads and snowmobile trails. When reviewing those public comments from the 2018 record, DEC responded with the following: "The Department believes there has not been a material increase in the miles of roads open to public motor vehicles in wild forest areas since 1972. The Department and the Agency are engaged in a process that will lead to an Agency APSLMP interpretation regarding road mileage in Wild Forest Areas of the Forest Preserve. This interpretation, once made, will apply to all Wild Forest UMPs." The Council applauds the Adirondack Park Agency's (APA) and Department of Environmental Conservation's (DEC) initiative to provide a limit on roads in Wild Forest areas, for legal and ecological reasons.

Review of Alternatives:
The APA has proposed three alternative interpretations of the no material increase language outlined in Wild Forest Guideline No. 4 in the SLMP:

1. NMI Alternative 1: 15% increase in road mileage This alternative is consistent with the 2008 snowmobile trail NMI interpretation. Snowmobile trail and road mileage are both limited by Wild Forest basic guideline No. 4, such that the same threshold for what constitutes a material increase could be established for each.

2. NMI Alternative 2: Increase more than 15% This alternative accounts for the fact that there is no replacement of road mileage closed due to reclassification of Wild Forest to Wilderness, Primitive, or Canoe areas (unlike snowmobile trails, see SLMP page 38). The Board would have to set the percentage or mileage increase if this alternative is pursued.

3. NMI Alternative 3: Increase less than 15% This alternative recognizes that the SLMP treats roads and snowmobile trails differently in the SLMP, in the sense that snowmobile mileage that is lost due to reclassification may be replaced, but there is no such provision for roads. The Board would have to set the percentage or mileage increase if this alternative is pursued.

According to the State Land Master Plan a road and snowmobile trail are defined as follows:

> Road -- an improved or partially improved way designed for travel by automobiles and which may also be used by other types of motor vehicles except snowmobiles, unless the way is a designated snowmobile trail; and is,
>
> > (i) either maintained by a state agency or a local government and open to the general public;
> > (ii) maintained by private persons or corporations primarily for private use but which may also be open to the general public for all or a segment thereof; or,
> > (iii) maintained by the Department of Environmental Conservation or other state agency and open to the public on a discretionary basis.
>
> Snowmobile trail -- a marked trail of essentially the same character as a foot trail designated by the Department of Environmental Conservation on which, when covered by snow and ice, snowmobiles are allowed to travel and which may double as a foot trail at other times of year.

While a snowmobile trail may be designated on a road, its design characteristics are different than a road (as reinforced by the 2021 Protect the Adirondacks! Inc. v. New York State Department of Environmental Conservation case). Roads are larger, can be used by bigger, heavier motorized machinery, require more maintenance and have larger ecological impacts. While the 2008 Snowmobile Guidance's 15% no material increase standard was cited by APA staff at the May APA Board meeting as a guiding standard, we believe it is an apples to oranges comparison given the variation in design standards. Therefore, the Council does not believe that the 15% NMI standard outlined in the 2008 Snowmobile Guidance is a good standard to set forth for roads.

The Adirondack Council further maintains that the SLMP is clear in stating that there shall be "no material increase" in road mileage on the Forest Preserve. We do not believe the APA interpreted wisely when it judged on snowmobile trails (for which the SLMP gives the same "no material increase" standard for Forest Preserve lands) that up to 15% meant no material increase. Given the many well-documented harmful effects of roads, we aver that any increase more than *de minimis*, say, 1%, constitutes a material increase.

Use vs. Mileage

In reviewing Wild Forest Guidance No. 4, it is clear that the original drafters were using road mileage as a proxy for limiting motorized use and its impacts. Therefore, it was not the mere presence of roads that they were seeking to limit, but the type of recreational use they are acquired having or designed for. The Agency should consider how motorized recreation has an impact on the natural resources and ecology of Wild Forest areas, and how limitations on such use align with the guiding mandate of the SLMP: "the protection and preservation of the natural resources of the state lands within the Park must be paramount."

CP-3 Access & Mileage

The Adirondack Council does support continued special access to persons with disabilities, consistent with Commissioners Policy #3 (CP3). The CP-3 routes designated by the state should be included in all road mileage calculations.

Landscape-scale Context

The issue of no material increase in road mileage should be considered at the landscape scale. With 800,000 acres of conservation easement lands in the Adirondack Park, the Agency needs to consider what the current opportunities for utilizing such lands for motorized recreation are and can be.

Ecological Considerations

The Adirondack Council wishes to remind the APA and DEC that the issue of roads on the Forest Preserve is not merely a legal, regulatory, and recreational issue; it is also an ecological issue. Roads are a fundamental threat to many wildlife species, and are the quickest way to undermine the ecological integrity and wild character of a place.

The Adirondack Council maintains that existing roads on the Forest Preserve are more than enough to meet the legitimate demands of recreational groups and emergency services. Roads essentially shrink wild places, so even from the narrow perspective of human recreation, they are usually more detrimental than beneficial.

The State Land Master Plan is also clear that recreational uses are to be accommodated on the Forest Preserve so long as they do not impair "the natural resource". Forgiving the authors for their utilitarian language, we commend them for putting Nature first. Most of our state, and our country, is now exploited for commercial gain. We should carefully listen to the wisdom of the far-seeing individuals who established New York's great Adirondack and Catskill Parks, declared that public lands therein would be *kept Forever Wild*, and deemed that human uses of those lands must be secondary to the "preeminent" need to protect natural conditions. Their wisdom is even more for preceding the field of conservation biology and its major discipline road ecology – which has produced many volumes full of information on the deleterious impacts of roads.

We should also listen to the wisdom of the people who preceded us in what we now know as New York. Indigenous tribes lived here for millennia with a much gentler impact on the natural world than we modern peoples have, largely because they lived without motor vehicles and roads.

Even as traditional ecological knowledge has come to be recognized as complementary to modern science (see especially the writings of Native American biologist Robin Wall Kimmerer), the road ecology literature – studies of the effects of roads on wildlife and natural processes – has mushroomed. We urge state and local officials to consider the deleterious effects of roads, including these:

1) Roadkill – direct killing of animals by machines;
2) Invasion by exotic species--roads are primary vectors for alien plants, pests, and pathogens to enter forests, and for aquatic invasive species to reach rivers and lakes;
3) Altered micro-climates—forest edges are susceptible to desiccation and windthrow, as well as exotic species invasions;
4) Facilitation of poaching – roads make it too easy for people with ample weapons but poor morals to approach and kill members of shy and wide-ranging species;
5) Inviting brood parasites and nest raiders – interior forest nesting birds are vulnerable to parasitism by cowbirds and predation by raccoons and other opportunistic predators who tend to be advantaged by roads (and utility lines and other fracture zones);
6) Reduced habitat security – shy, wide-ranging, and sensitive species (including some songbirds, carnivores, and amphibians) lose safe home ranges when roads are built and maintained.

Along with such harmful ecological effects, roads also have bad economic and recreational consequences. Economically, maintaining backcountry roads usually makes no sense. Roads are very expensive to maintain, costing taxpayers thousands of dollars per mile yearly to maintain. (We politely ask the DEC to disclose its Forest Preserve road maintenance costs, which we suspect are a hefty fraction of DEC's budget in the Park.)

Recreationally, roads make it harder to find peace and quiet and solitude. Roads shrink wildlands. The way to increase people's access to Nature is to expand wildlands, bring Nature closer to where people live, not maintain habitat-fragmenting roads into the backcountry. Quiet recreation increases individual and public health. Roads diminish opportunities for quiet recreation, like hiking, fishing, and wildlife-watching.

Future State Land Acquisition

Officials have raised the question, if we put a tight cap on Forest Preserve road mileage, do we thereby stop land acquisitions for the Forest Preserve, since we are near or above the mileage of roads on the Forest Preserve present when the SLMP was enacted? The Adirondack Council answers that question with an adamant NO, and reminds officials that roads can and should be closed, for ecological, aesthetic, spiritual, recreational, economic, and public health reasons. Far from preventing future Forest Preserve additions, the road mileage cap should be seen as an opportunity to close and re-vegetate unneeded roads fragmenting our state's critical forests.

Climate Crises

As the state advances with its climate scoping plan, identifying opportunities to reduce greenhouse gas emissions, promote carbon sequestration through natural processes, and support landscape resiliency, we ask that this administrative action contemplate (for further public review) how it supports the state's long-range climate goals. The climate crises had not gained the recognition it has today when the SLMP was enacted, so they could not have understood the need to limit carbon-producing and habitat-fragmenting types of recreation on Forest Preserve. We ask the Agency to contemplate how increasing road mileage will support or impair the climate resiliency and mitigation qualities and potential of current and future state lands.

In closing, the Council appreciates the APA's intent to provide clarity to a long-standing black-hole of SLMP interpretation. However, the Council would like to a see a *de minimis* standard set forth in this interpretation. Please strictly cap road mileage on the Forest Preserve, even while continuing to enlarge

the Forest Preserve, for the good of all New York residents, human and wild. Thank you for reviewing our comments and we look forward to reviewing the next iteration of this proposal.

Sincerely,

Jackie Bowen
Director of Conservation

June 24, 2022

Megan Phillips, Deputy Director for Planning
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Re. Public Comment, Wild Forest Guideline No. 4, "No Material Increase"

Dear Ms. Phillips,

Comment Summary: Adirondack Wild appreciates having the 60-day comment period, as it affords the public sufficient time to try and relate this particular State Land Master Plan guideline for which you are seeking input to the entire Master Plan. While we thank the Agency for the chance to "inform the APA Board's interpretation of the Adirondack Park State Land Master Plan's Wild Forest Basic Guideline No. 4," we also think that in the process APA has created several erroneous impressions which are serious, and which should be corrected.

I. One misimpression the APA has created is that Wild Forest Guideline No. 4, the so called "no material increase" guideline, can be interpreted in isolation from other important Wild Forest guidelines as well as other sections of the Adirondack Park State Land Master Plan (hereinafter, the "Master Plan"). Adirondack Wild does not believe that Guideline No. 4 can be read in isolation but must be interpreted in context with other parts of the Master Plan because the Master Plan's guidelines and contents are interrelated. They tie together. It is the Agency's job to interpret the Master Plan as a whole and through training make the mutually reinforcing guidelines discernable and applicable to setting basic policy and long-range planning for the Park's state lands.

II. Another serious misimpression is that the APA's request for public comment about the miles of road available for public motorized use strictly on Forest Preserve classified Wild Forest fails to examine the Adirondack Park as a whole, in which there are roughly 800,000 acres of private land under conservation easement, with roads opened by some of those easements to public motor vehicles year-round, or seasonally. Measurements of "materiality" in the increase of motorized miles or uses should not be made solely within Forest Preserve Wild Forest. Doing so makes little sense from a park planning perspective. In fact, the Master Plan specifically mandates that the APA take into account actual and projected uses on private land.

III. A third misimpression: Although Wild Forest Guideline No. 4, "no material increase," applies to snowmobile trails and motor vehicle roads, the APA presents its 2008 decision – that a 15% growth in the mileage of snowmobile trails since 1972 would not be considered "material" – as a reasonable standard or guide to apply to the growth in motorized road mileage on Wild Forest. In fact, the NYS Court of Appeals ruled in 2021 that the 27 miles of snowmobile community connector Class II trails approved by the APA and DEC after 2009 were not only material, they were unconstitutional. The 2021 NYS COA ruled, in part, that "the construction of the Class II trails is, for constitutional purposes, no different than the construction of the bobsleigh run. Both would work a substantial change to the Forest Preserve" – and, thus, both required a constitutional amendment. Therefore, in 2022 the APA should not accept its 2008 Master Plan interpretation of the materiality in the growth of snowmobile trails as any kind of justifiable guide or standard to be repeated today.

We will now delve into some detail about our 3-prong critique, above.

Basic Guideline No. 4: The APSLMP's Wild Forest Basic Guideline No. 4 states that "*Public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972.*"

Measuring what may be a "material increase" in both road and snowmobile mileage on Wild Forest has bedeviled the staff of both agencies for 50 years. Staff do require accurate information as to what existed in 1972 and what exists today. We appreciate the work put in to establish today's Wild Forest motorized road baselines and APA's confidence in them.

However, confidence in the snowmobile trail mileage on Wild Forest has never existed. It was estimated from hand-drawn maps and field checked with surveyor wheels in the 1970s and again early in the 21st century. Those snowmobile estimates spanned the digital divide and the quality of the estimation varied considerably across the region. As a result, the snowmobile mileage remained an estimate. That lack of clarity contributed to the flawed "Comprehensive Snowmobile Master Plan" of 2006, and an incorrect 2008 determination by the APA that the growth in snowmobile trail mileage since 1972 was immaterial.

The Wild Forest snowmobile mileage estimate in 2006 was just over 750 miles. The snowmobile trail estimate on private and municipal lands at that time was 1100 miles parkwide. The state, private land and municipal snowmobile trails were never compiled together and never treated comprehensively, but the Master Plan says they should have been - just as motorized roads should be today.

Other Master Plan Guidelines Must Also be Considered: The Master Plan appeared internally integrated to its early authors and interpreters. It is tempting for today's APA to improperly read these guidelines in isolation from each other. That appears to be happening. APA staff and board should be continually trained to interpret the Master Plan as a comprehensive, integrated document.

If one does, then Guideline No. 4 must be interpreted alongside Guideline No. 1 of Wild Forest *Recreational Use and Overuse*:

> *"All types of recreational uses considered appropriate for wilderness areas are compatible with wild forest and, in addition, snowmobiling, motorboating and travel by jeep or other motor vehicles on a limited and regulated basis* ***that will not materially increase motorized uses that conformed to the***

> ***Master Plan at the time of its adoption in 1972 and will not adversely affect the essentially wild character of the land*** *are permitted" (emphasis ours).*

The Recreational Use and Overuse guideline significantly conditions Guideline No. 4. It focuses on recreational use, not strictly mileage. It focuses on the essential wild character of the land. How much motorized uses (including mileage) have grown since 1972 and how they may be affecting the essential wild character are vital judgment calls, not strict measurements. While knowing the mileage of routes in 1972 and today and judging their "materiality" is very important, it is not at all sufficient.

We say this with some confidence because we met with Norman J. Van Valkenburgh in 2006 to seek answers about the Master Plan from someone who ought to know. Norm was the DEC's Director of Lands and Forests at a crucial point in time from 1976-1980 when DEC felt obliged to carry out the Master Plan's guidelines, including the Wild Forest guideline No. 4. We asked Norm about the Master Plan's Wild Forest guidelines. We asked him how we should read them coherently. Even as everyone appears focused on the mileage of roads and trails open to motorized uses, Norm told us that emphasis is misplaced. The real emphasis should be on use.

Norm explained to us that Wild Forest Guideline No. 1 under *Recreational Use and Overuse "doesn't say mileage; it says use, which means the level of use today should be no greater than such use was in 1972. If there were, say, one hundred snowmobiles using the snowmobile trails on the Forest Preserve in 1972, then no more than one hundred should be allowed on those trails today – whatever mileage of trails there was or is today…Everyone has focused on the mileage of snowmobile trails and ignored the crux of the plan. The purpose of the Master Plan was to restrict and control use, not set a limit of the number of miles of trails. That's why no such number was put in the Master Plan. Trail width, height, tread, parking and all other uses facilitating motorized vehicles such as snowmobiles similarly should not be materially increased beyond what existed in 1972*," he said.

Van Valkenburgh went on to say that unit management plans (UMP), the documents which carry out the general guidelines of the Master Plan, should be used to appropriately limit additional motorized uses, locations, mileages. "UMPs can actually be the tool to ratchet back such uses," he said. "The Master Plan sets an upper limit on such uses, but DEC has ample authority to set those limits lower in each UMP."

That DEC "ample authority" and need to exercise good judgment is found in Master Plan Wild Forest Guideline No. 3 under *Motor Vehicles and Motorized Equipment*:

> *"The Department of Environmental Conservation may restrict, under existing law and pursuant to authority provided in this master plan, the use of motor vehicles, motorized equipment and aircraft by the public or administrative personnel* ***where in its judgment*** *the character of the natural resources in a particular area or other factors make such restrictions desirable."*

Do Motorized Uses Expand with growth of the Forest Preserve? At their May 2022 meeting, some members of the APA seemed uncertain about whether "no material increase" applied only to pre-existing Forest Preserve as of 1972. Maybe what was intended, they asked, was the expansion of motor vehicle opportunities on Wild Forest classification whenever the Forest Preserve's Wild Forest areas grew in acreage.

Once again, Wild Forest guidelines in the Master Plan must be read in their entirety. Under the heading Roads, Jeep Trails and State Truck Trails, Guideline No. 3 clarifies the question of newly acquired Forest Preserve classified as Wild Forest:

> *"Established roads or snowmobile trails in newly-acquired state lands classified as wild forest may be kept open to the public, subject to basic guideline 4 set forth above."*

"Subject to basic guideline 4" demonstrates that the Agency and the Department were anticipating the additional acquisition of Forest Preserve post 1972 and that agencies understood that the mileage open to public use of motor vehicles should be constrained and should not materially expand as the result of state land acquisitions.

Putting together all Master Plan Wild Forest guidance should give the APA little doubt of what was intended by the authors of the Master Plan – to tightly constrain the mileage open to public use of motor vehicles in the Adirondack Forest Preserve and not to expand that mileage as new state lands were acquired. The APA understood in 1972 that such constraints were fundamental to a 20th century application of the meaning of the "Forever Wild" provisions of Article 14, Section 1 of the New York State Constitution. Just one year ago the NYS Court of Appeals reaffirmed that constitutional meaning, cited the 1930 bobsled decision as precedent, ruled that community connector snowmobile trails were unconstitutional and essentially struck down the 2009 APA-DEC Master Plan conformance decisions with respect to those trails.

Private Ownerships: APA's interpretation of Wild Forest Guideline No. 4 should and must take into account the Master Plan's section on Private Ownerships (Master Plan, Page 3). It states that:

> *"The state has also acquired…a variety of conservation easements and less-than-fee interests in private lands that serve an important public purpose in either providing public access to state lands or in preserving the natural, open space character of the private land burdened by the easement* ***for the benefit of other state lands in the Park*** *(emphasis ours). These less-than-fee interests are an important element in the relationship between state and private lands…****This master plan for state lands has therefore attempted to take into account…this intermingling of private and public lands within the Park"*** *(emphasis ours).*

One of the most fundamental changes to the Adirondack Park since 1972 is the very significant acreage of private lands now under conservation easement – more than 800,000 acres. There was no conservation easement law until 1983. Now, miles of private industrial roads as well as trails on conservation easements are open to some form of negotiated public motorized recreation. The latest example is the 16-miles of dirt road newly opened to public motorized uses from May-September through the Kildare Conservation Easement Recreation Area Management Plan. In fact, DEC's easement program and its 2006 snowmobile plan were expressly intended to shift some motorized access off the Forest Preserve and onto routes on private land.

APA is a land use planning agency and should interpret the Master Plan's guideline about materiality of Forest Preserve routes open to motorized uses through the planning lens of the entire Adirondack Park. A close reading of the Master Plan makes this comprehensive look mandatory. Under Private Ownerships, the Master Plan states on page 3 that:

"The Act clearly recognizes the unique land ownership pattern within the Adirondack Park…and mandates the Agency to reflect in this master plan the actual and projected uses of private lands within the Park."

Before proceeding with an interpretation of Wild Forest Guideline No. 4, the APA should and indeed must know and map the mileage and location of routes on private and municipal land as well as on the Forest Preserve.

DEC Commissioner's Policy 3, CP-3, Access for Persons with Disabilities: The APA's question whether "CP-3" routes are road miles to be considered for "no material increase" purposes should be answered affirmatively. Most of these routes in approved UMPs or their alternatives were agreed to by the plaintiffs and parties to the Galusha case settled in 2001 in federal court, a settlement in which we took part. These routes were not to be on Wild Forest trails but on roads solely open to certified individuals with disabilities, and not to the general public. While from a legal perspective the routes cannot be closed to certified individuals with disabilities, from a Master Planning perspective the APA should include them because they contribute to motorized mileage and uses which exceed those available under the Master Plan in 1972.

Hard Cap Needed: Regardless of which scenario (1,2 or 3) the APA presents for public comment, it is clear that both motorized mileage (245 miles on Wild Forest in 2022) and motorized uses have grown by at least 20% on Wild Forest since 1972 (206 miles in 1972). Any reasonable definition of "materiality" in both motorized miles and uses has already been reached and exceeded. A hard cap on additional motorized miles and uses must be put in place. New roads that the agencies in future deem necessary to open to motorized uses in Wild Forest must, therefore, correspond to closure of resource damaging or damage inducing roads elsewhere.

Reduce the Increase: Given these material increases in both miles and motorized uses, efforts should be immediately made by the DEC Regions 5 and 6, pursuant to the Master Plan, to close some existing motorized roads especially damaging to the Forest Preserve, and thus to limit the total increase since 1972 to less than 15%. For example, parts of the Bear Pond Road in Watson's East Triangle Wild Forest which border the Five Ponds Wilderness have long induced illegal off-road incursions into the Five Ponds Wilderness. Some motorized roads in the Aldrich Pond Wild Forest have long caused extensive natural resource damage, ongoing. Also, the section of Deer Pond Road (Blue Mountain Wild Forest) that enters the Essex Chain of Lakes Primitive Area should be closed because of damage to that Primitive Area. Parts of the easily eroded Gulf Brook Road, Vanderwhacker Wild Forest, should be closed due to resource damage, high maintenance cost and adjacency to Wilderness.

These are just some of the many examples of existing Wild Forest motorized road segments causing considerable damage to wilderness, natural resources and wild forest character where "DEC may restrict under existing law and pursuant to authority provided in this master plan the use of motor vehicles" (Master Plan, page 35).

We repeat: Reducing the increase in motorized miles and uses since 1972 to less than 15% and imposing a hard cap are especially justified because the 800,000 acres of private lands under easement in the Park has so significantly increased public motorized uses and opportunities in the Adirondack Park since 1972. Once identified, counted and mapped, these additional motorized miles and uses on private land should color and influence the APA's interpretation of Wild Forest guidelines, including Guideline No. 4. This task of relating Wild Forest to private land motorized use is obligatory because the Master Plan on

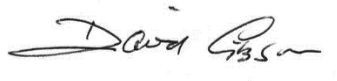
page 3 **"mandates the Agency to reflect in this master plan the actual and projected uses of private lands within the Park"** (emphasis ours).

Conclusions: A strict focus on Wild Forest Guideline No. 4 is improper and insufficient. Adirondack Wild feels the Agency is obligated to interpret the Master Plan more comprehensively, so that:

1. Motorized mileage and uses are both read and considered as relevant to judgements about "materiality" under several interrelated Master Plan guidelines;
2. Private lands under conservation easement allowing motorized uses are properly identified and factored into these judgments as required by the Master Plan;
3. Motorized roads causing present damage to the Forest Preserve be assessed and, under the Master Plan, restricted from motorized use by the public (excluding Galusha CP-3 routes), keeping growth in motorized road miles and uses on Wild Forest since 1972 under 15%;
4. In light of the 2021 Court of Appeals decision and employing a more comprehensive reading of the Master Plan, reconsider APA's 2008 interpretation that a 15% increase in snowmobile trail mileage since 1972 was immaterial.

On behalf of our Board of Directors and Members, thank you very much for considering our comments, concerns and recommendations.

Sincerely,



David Gibson, Managing Partner
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Basil Seggos, DEC Commissioner
Adirondack Wild board and advisors

Adirondack Wilderness Advocates

June 28, 2022

Megan Phillips
Deputy Director, Planning
Adirondack Park Agency
Re: public comment on the topic of no material increase of road mileage on Wild Forest

Dear Deputy Director Phillips:

Adirondack Wilderness Advocates (AWA) appreciates the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?
2) What constitutes a material increase in road mileage?
3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

AWA's comments are consistent with our Official Policy on Motorized Recreation (available here: https://adirondackwilderness.org/about-policies-motorized-recreation/) and reflect our interest in protecting Wild Forest character and enhancing remoteness and solitude.
Any interpretation of the SLMP's stipulation "there will not be any material increase in mileage of roads" must incorporate the SLMP's broader limitation of motorized use and preservation of the essentially wild character of Wild Forest lands. Road mileage is merely one of the ways to measure "no material increase" – which in itself has been misinterpreted, as applied in the 2008 snowmobile guidance. The intent of the authors of the SLMP was to halt the growth of motorized use, not simply the road mileage, in the forever wild Forest Preserve. As such, AWA contends that this is only one aspect of the APA's responsibilities with respect to limiting motorized use and that only one of each of the alternatives – NMI Alternative 3 and Road Alternative 1 – advanced in the APA's proposal are consistent with the terms of SLMP and the constitutional "forever wild" law in which they are rooted. Furthermore, AWA does not believe that the proposed guidelines should be promulgated without a broader scope that defines and addresses other factors affecting the volume and impact of motorized activity in Wild Forest areas.

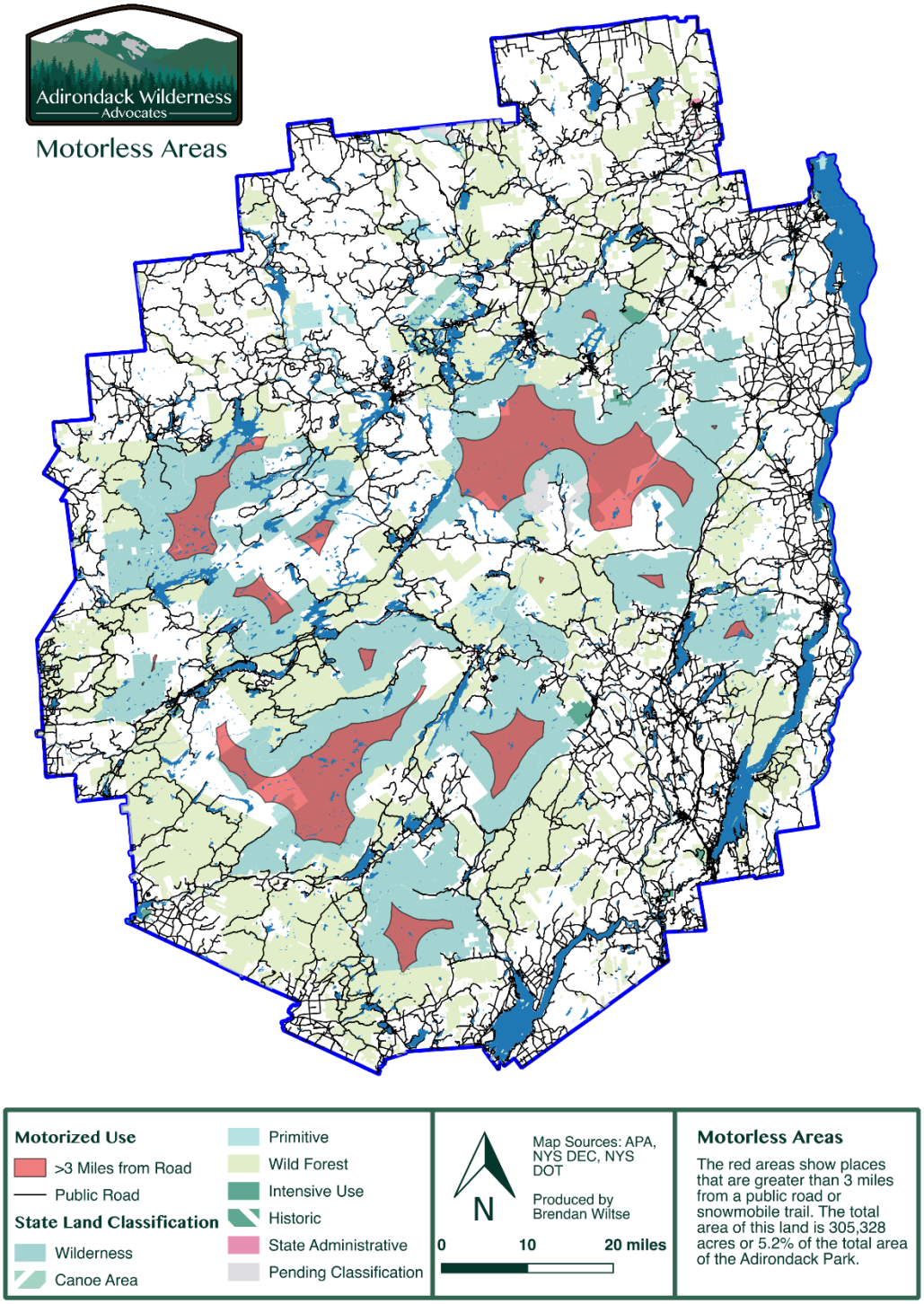
AWA makes the following arguments in support of our position.

1. The SLMP unambiguously places a priority on limiting motorized use in Wild Forest, and protecting remoteness and solitude, through the explicit requirement to preserve "Wild Forest character." For example, there is this language on *Recreational Use and Overuse* in the Wild Forest section:

   > *"All types of recreational uses considered appropriate for wilderness areas are compatible with wild forest and, in addition, snowmobiling, motorboating and travel by jeep or other motor vehicles on a limited and regulated basis that will not materially increase motorized uses that conformed to the Master Plan at the time of its adoption in 1972 and will not adversely affect the essentially wild character of the land are permitted."*

   Thus, the ceiling of "no material increase" is not just about mileage, but motorized use and its effect upon Wild Forest character. The APA's public focus is better served by considering a reasonable interpretation of the meaning of "Wild Forest character" and using metrics that better measure it.

   In several places the SLMP speaks directly to the issue of appropriate locations for motorized use, with preference to travel corridors and borders of Wilderness and Wild Forest areas, avoiding motorized access to the heart of larger areas and thus preserving remoteness. This suggests that remoteness is a useful metric. AWA produced the following map during the Boreas classification process, which shows areas in the Adirondack Park that are more than three (3) miles from a road or snowmobile trail:



This map demonstrates the efficacy of using a geographic measure of remoteness, which is a core value in the SLMP – and a precious resource worldwide. Remoteness, more than a simple measure of trail and road mileage, is a fundamental component of Wild Forest character.

On the other hand, road mileage is a difficult metric to gauge accurately and impossible to measure precisely. In its memo, the APA has given calculations for Wild Forest road mileage in 1972, and at present. Everyone who is well-versed in the Forest Preserve knows how many unofficial, illegal, even clandestine roads dot the Park. The presence of these motorized corridors limit the precision and value of road mileage as a measure and means of constraining increased motorized use. Meanwhile, whatever the mileage of roads in the Forest Preserve, there is no question that motorized use has greatly increased since 1972, and this increase constitutes a direct challenge to the preservation of environmental resources, remoteness and solitude.

Additionally, AWA objects to one specific calculation choice incorporated into each of the tallies presented in the proposal: The mileage tallies account inconsistently for roads included in the Moose River Plains Camping Area, which is described in pp. 44-45 of SLMP. According to the proposed tallies, this mileage is counted for 1972 because at that time the 23.5 mile road was classified as Wild Forest but excluded from current date tallies even though it remains an operational road. The rationale for treating it this way is that the road corridor has been reclassified – uniquely for a corridor running through the heart of a Wild Forest area – as an Intensive Use area. At the time the road was reclassified, several other roads were closed within the Moose River Plains Wild Forest and parts of the tract were designated Wilderness areas. These combined actions were adopted as a compromise with respect to motorized use of the Wild Forest area, eliminating activity in some areas and concentrating it in others. However, the tallies in the proposed action treat the Moose River Plains reclassification as if it had closed all the roads in the corridor. AWA believes that this choice is arbitrary and inconsistent with the SLMP's broad, absolute limitations on increased motorized use throughout the Wild Forest areas of the Adirondack Park. If the SLMP is amended to reclassify an area that was Wild Forest in 1972 to Intensive Use, the accounting for mileage and motorized use should be consistent over time. The mileage should either be excluded from both the 1972 and present day tallies or included in both. To do otherwise is to create an accounting gimmick that obscures ongoing motorized use that is clearly at odds with the forever wild purposes of the Forest Preserve and the balancing regime incorporated into the SLMP.

2. The APA's question #2 concerns the interpretation of the term "no material increase." There are three important points to make about this phrase. First, as shown above, "no material increase" applies to motorized use, not just road mileage. Second, "no material increase" over motorized use in 1972 is by very definition of the words an absolute measure, not a relative measure. Some have advanced the argument that "no material increase" allows for an increase in motorized use proportional to the increase in Wild Forest lands since 1972. But there is no such provision anywhere in the SLMP, and nothing vague about the wording. "No material increase" means just that. Third, the determination in the 2008 snowmobile

guidance that mileage increases up to 14.7% do not constitute a material increase is mathematically indefensible. There is no statistically valid interpretation by which 15% would not be considered a material numeric increase. Put colloquially, it's hard to imagine how a 14.7% raise in wages or salaries would be considered by any worker or employer as not being a "material increase." Whatever the rationale for the 2008 snowmobile guidance, this percent must not be used as a basis for considering increases in Wild Forest roads. AWA therefore contends that the NMI Alternative 3 option, which stipulates that "no material increase" means less than 15%, is the only one consistent with the terms of the SLMP.

3. AWA's official policy is that a road is a road: motorized use is equal. We do not distinguish between snowmobiles, ATVs, automobiles or any other form of motorized transportation. This policy is a rational basis for measuring and considering the impact of motorized use in the Forest Preserve, regardless of the purpose for it. This reasoning becomes even more important as modes of motorized transportation proliferate now and into the future. We already have seen the explosion of ATVs since 1972. Now the electric revolution will bring a whole array of new motorized vehicles, from eBikes to electric ATV's and more. With the understanding that the SLMP considers snowmobiles as a separate and exceptional form of motorized transportation, this is an important time for the APA adopt the same policy, so that a uniform approach to protecting Wild Forest character prevails instead of a patchwork quilt that forms around different types of conveyances.

4. AWA supports the Commissioners Policy #3 (CP3), allowing permit access on DEC administrative roads for members of the public with limited mobility. However, per point #3, from AWA's standpoint any "ways" used by the public for the purpose of motorized access are by SLMP definition roads, regardless of type of vehicle or use, and should be counted in any metrics, because SLMP does not permit motorized access on any other facility. This is consistent with the SLMP, which explicitly describes the public use of roads. Because motor vehicle access is impermissible on trails, all CP3 routes must by definition be existing road and therefore be included in "no material increase" calculations. All other options are expressly prohibited by the SLMP.

In conclusion, AWA welcomes the APA's effort to clarify the SLMP's provisions barring increased road mileage in the park as part of a broader clarification of all guidelines in service of limiting motorized use in Wild Forest areas as the SLMP requires. While AWA identifies certain alternatives in this proposal that are consistent with SLMP, it believes the APA and public would be better served by reviewing and developing guidelines that comprehensively address motorized use in the park. AWA strongly suggests that the APA take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP. Specifically, this policy must conform to the concept of "no material increase" in motorized use in Wild

Forest areas, with strong considerations for measuring and protecting remoteness and solitude, which are the cornerstone of Wild Forest character.

Once again, our thanks for the opportunity to provide public comment.

For Adirondack Wilderness Advocates,

Pete Nelson
Secretary

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11 July 2022

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RE: Interpretation of the Adirondack Park State Land Master Plan's Wild Forest Basic Guideline No. 4, Adirondack Park SLMP: WF-BG No.4

Dear Meg and Josh,

The question of whether "roads" as defined in Commissioner's Policy No. 3, Motorized Access Program for People with Disabilities (CP-3, MAPPWD), should be considered "public roads" as defined in the Adirondack Park State Land Master Plan (APSLMP) is an important issue for ADK. We are grateful that APA and DEC are addressing this unanswered question which has been holding up the development of unit management plans in the Adirondack Park, and appreciate the opportunity to submit comments.

Currently, if CP-3 roads were to be considered public roads, the Department of Environmental Conservation (DEC) would not be able to open any additional motorized public roads in areas classified as Wild Forest unless public road mileage was closed elsewhere in the park.

Consistent with the APSLMP, ADK does not support the expansion of public roads in Wild Forest Areas of the Forest Preserve. However, since CP-3 access is not open to the public, we do not consider it the same as public road access. We recommend that Visitor Use Management Planning be used to adequately determine when and where access should be expanded.

The APA Board is being asked to interpret Wild Forest Basic Guideline No. 4 in the ASLMP, which reads, "Public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972." (APSLMP 2019 version, p.35)

In your presentation to the Board in May, you explained that the following questions would need to be addressed in the Board's interpretation:

1. What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2. What constitutes a material increase in road mileage?

3. Does CP-3 mileage meet the definition of a road in the APSLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

APA and DEC staff answered the first question: the total road mileage in Wild Forest areas in 1972 (when the APSLMP was first authorized as a guidance for the Adirondack Park) was 211.6 miles. Present-day mileage, excluding CP-3 mileage, is 206.6 miles; and present-day CP-3 mileage totals 21.6 miles, with an additional 16.5 miles of CP-3 mileage approved in unit management plans that have not yet been opened. When these are all combined, total present-day mileage of roads is 244.7 miles.

The second question has yet to be decided. Currently, an increase of up to 15 percent is being presented as an option by the agencies (along with options of some percentage above or below 15 percent), as a standard for "no material increase" for public roads in Wild Forest areas.

The 15 percent standard has its origin in the Adirondack Forest Preserve snowmobile program. An increase of up to 15 percent is currently not considered a material increase for snowmobile trails (which have their own mileage counts that started in 1972, when there were 740 miles of snowmobile trails). An increase of 15 percent for snowmobile trails (i.e., a cap of 848.88 miles) was used because this was the mileage of snowmobile trails that existed in 1998 when DEC's Office of Natural Resource Policy No. 2 (ONR-2) was adopted.

A 15 percent increase of 1972 Wild Forest road mileage (i.e., 211.6) would be 31.7 miles, for a total of 243.3 miles of roads. If CP-3 road mileage is included in the total for Wild Forest road mileage, then there is currently 244.7 miles of roads, which would represent a material increase of roads. Consequently, some roads (totaling 1.4 miles) would have to be closed to conform with the APSLMP.

Further complicating the issue is the settlement and consent decree issued in Galusha v. NYS Department of Environmental Conservation et al., which required DEC to keep open a total of 26.04 miles listed for the CP-3 program. After working with the plaintiffs to adjust the routes to provide better opportunities for people with disabilities, that required total is now 21.56 miles of CP-3 program roads.

The third question involves the definition of a "road" in the APSLMP. Currently, roads are defined in the APSLMP as follows:

Road—an improved or partially improved way designed for travel by automobiles and which may also be used by other types of motor vehicles except snowmobiles, unless the way is a designated snowmobile trail; and is,

(i) either maintained by a state agency or a local government and open to the general public;

(ii) maintained by private persons or corporations primarily for private use but which may also be open to the general public for all or a segment thereof; or,

(iii) maintained by the Department of Environmental Conservation or other state agency and open to the public on a discretionary basis. (page 20 APSLMP 2019)

The key elements in the definition above that the APA Board must consider involve determining if "open to the public on a discretionary basis" and "general public" fits CP-3 roads.

Arguably, CP-3 roads are not open to the public. Those wishing to participate in CP-3 must have a physician certification of mobility impairment and apply for a temporary revocable permit, which permits "uncommon access. . . . to travel beyond the reach of public roads, to areas where others must hike or bike. The permit provides access for those who seek solitude, connection to nature, undisturbed wildlife habitat, and inclusion with fellow sportspeople." (DEC website: MAPPWD CP-3)

Interestingly, the definition of a road in CP-3 differs from that in the APSLMP in several ways including the provision that a road in CP-3 can be "designated for use by qualified people with disabilities."

Road means an improved or partially improved way designed and maintained for travel by automobile and may also be used by other types of motor vehicles, including snowmobiles, on those ways designated for such use; and is,

- Either maintained by a State agency or local government and open to the general public; or,
- Maintained by private persons or corporations primarily for private use but which may also be open to the general public for all or a segment thereof; or,
- Maintained by the Department or other State agency and is open to the public on a discretionary basis; or,
- Designated by the Department for use by qualified people with disabilities.
- Pursuant to the Adirondack Park State Land Master Plan and Catskill Park State Land Master Plan, the Department may further restrict the use of motor vehicles where in its judgment the character of the natural resources in a particular area or other factors make such restrictions desirable. (DEC website: MAPPWD Policy CP-3)

To help the APA Board and the public in their decision-making process, DEC and APA created a matrix of scenarios of potential alternatives (see figure 1).

May 10, 2022 33

Alternatives Scenarios

		Road Definition Alternative		
		#1 - CP-3 included	#2 - CP-3 not included	#3- Non-Galusha CP-3 included
		CP-3 mileage considered roads under SLMP definition	*CP-3 mileage not considered roads under SLMP definition*	*CP-3 mileage generally considered to be roads under SLMP definition, except Galusha routes*
NMI Alternative	#1 - 15% increase (Total allowable mileage 243.3 miles)	1.4 miles over allowable mileage; will require closure of some existing roads*; consistent with overall goal of the SLMP to limit roads on wild forest	36.7 miles under allowable mileage; no closure of existing roads needed; encourages more exclusive disability access; acquisition of new lands will not create pressure to close CP-3 routes	20.2 miles under allowable mileage; no closure of existing roads needed; balances goals of wild forest guideline #4 with disability access; maintains at least the CP-3 mileage or equivalent agreed to in Galusha
	#2 - >15% increase (Board must set % or mileage)	May capture existing and future CP-3 mileage; need for closure of existing roads unlikely*; inconsistent with snowmobile mileage interpretation	No closure of existing roads needed; allows additional roads on wild forest in future UMPs; may not retain character of wild forest; inconsistent with snowmobile mileage interpretation	No closure of existing roads needed; allows additional roads on wild forest in future UMPs; may not retain character of wild forest; inconsistent with snowmobile mileage interpretation
	#3 - <15% increase (Board must set % or mileage)	Will require closure of some existing roads*; consistent with overall goal of the SLMP to limit roads on wild forest and different treatment of roads and snowmobile trails in SLMP	No closure of existing roads needed; may be consistent with overall goal of the SLMP to limit roads on wild forest and different treatment of roads and snowmobile trails in SLMP	Existing road closure unlikely (Board would have to set % increase at 5 or less)*; consistent with the overall goal of the SLMP to limit roads on wild forest and different treatment of roads and snowmobile trails in SLMP
	**Any new state land acquisitions classified as WF will or may require road closures or not permit WF acquisitions with existing roads.*			

Figure 1. Alternatives Scenarios, Courtesy of APA and DEC

The alternative that presents itself as the simplest choice is Road Definition Alternative #2, Non-Material Increase Alternative #1. Under this alternative, CP-3 roads are not considered roads under the current definition in the APSLMP, leaving 36.7 miles of allowable roads for future Unit Management Plans in Wild Forest areas. In this alternative scenario the number of CP-3 roads is potentially unlimited. Currently, the CP-3 program across New York State has only 1009 participants, with some subset of these permittees residing in the Adirondack Park.

Rather than setting limits on CP-3 mileage, which has the potential of attracting new litigation, a better strategy would be to use a Visitor Use Management process and adaptive management to set thresholds (e.g., ecological, social, infrastructure impact, and other metrics) and monitor use on CP-3 program roads. If ecological (or other) impairment from use exceeds established thresholds, then management action can be taken to limit use on program roads, or to close roads in areas that prove, through monitoring, to be ecologically sensitive to use and reopen program roads in other areas that can handle the use. Further, the Visitor Use Management process and adaptive management should be used to set thresholds and monitor use on all roads in Wild Forest areas.

A more protective alternative, given that a Visitor Use Management system is currently not in place, could be achieved with Road Definition Alternative #3, Non-Material Increase Alternative # 1. Under this alternative, CP-3 roads are generally considered to be roads, but the Galusha

settlement and consent decree routes are exempted from the road mileage counts, because DEC lacks discretion to close those roads.

Although none of the proposed alternatives require an APSLMP amendment, amending the APSLMP to add a new definition for CP-3 roads, using the definition provided in CP-3, could be helpful in clarifying the issue in the APSLMP.

Sincerely,

Cathy Pedler
Director of Advocacy, ADK (Adirondack Mountain Club)
cathy@adk.org
518-935-0492

ADK (Adirondack Mountain Club) works to protect New York State wild lands and waters by promoting responsible outdoor recreation and building a statewide constituency of land stewardship advocates. Based out of the Adirondack Park in New York State, ADK is a leader in providing outdoor education, promoting responsible recreation, and organizing stewardship experiences. Since 1922, the organization has worked to increase access to the backcountry by building trails, conserving natural areas, and developing a stewardship community that supports the ethical and safe use of New York's outdoor spaces. A member, donor, and volunteer-supported organization, ADK reaches across New York through its 27 chapters to inspire people to enjoy the outdoors ethically.

Supervisor
Brian Wells

Principal Accountant
Suzanne Walrath

Town Clerk
Julie Clawson

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The Town of Indian Lake is an equal Opportunity Provider and Employer

Town Board
John Rathbun
Jake Mahoney
D. Sean Curry
Kristina Eldridge

Megan Phillips, Deputy Director for Planning
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

June 17,2022

Thank you for allowing Local Government and individuals to comment on pending interpretations of the State Land Master Plan. Unfortunately, I don't feel that any of the proposed Alternatives will address all the inequity that has been placed on the residents of the Adirondacks. Limited by what is being presented I would have to support.

NMI Alternative 2: Increase more than 15 %
This increase should be tied to the percentage of land acquired by New York State since 1972.

Road Alternative 2 – CP-3 not included

The "Galusha/CP3" road mileage should not be included in any milage cap. To do so would be a continuation of discriminatory actions. Using one user group to discriminate against another with an arbitrary milage cap is not what the Court envisioned in its judgement.

The State of New York with its outdated and discriminatory State Land Master Plan has curtailed Economic, Social development and Diversity within the Park. The Regulatory Agencies that are tasked with enforcement and interpretations of this draconian document need to evolve instead of being mired in past practices and policies.

Brian E Wells

Brian E Wells – Supervisor Town of Indian Lake
Hamilton County Chairman
Member 5 Towns

RECEIVED
ADIRONDACK PARK AGENCY
JUL 11 2022

STATE OF NEW YORK CONSERVATION FUND ADVISORY BOARD
625 Broadway, Albany, NY 12233-4800

July 12, 2022

Megan Phillips
Deputy Director of Planning
Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

Dear Ms. Phillips,

The NYS Conservation Fund Advisory Board is a statutory board that works with sportsmen/women across New York to encourage public participation in fishing, hunting, and trapping and promote conservation and management of New York's natural resources. To this end, we believe that more people can participate in these pursuits if there is better access to state owned/managed lands. The issue of how road mileage limitations are applied in the Adirondacks has a direct impact on our stated goals and mission and could have impacts on the number of sporting licenses sold in NYS.

Therefore, we advocate for an expansion of the 1972 limitations in a way that fairly balances the road mileage allowed with the sizeable increases in Wild Forest lands that have occurred in the last 50 years. In addition, efforts should be undertaken to expand CP-3 motorized access opportunities for those with disabilities, especially our veterans. Generally speaking, state lands classified as Wild Forest that contain an accessible road network provide the best opportunity for all abilities of interest groups to recreate. Traditionally these lands see the most amount of usage.

New York State has an aging demographic, especially among those in the sporting community and the loss of accessible lands for these individuals to enjoy hunting, fishing and trapping further negatively impacts the sporting community.

It has been well documented by the NYS Comptroller as well as several national studies that the sporting community represents a multi-billion dollar industry in New York State. Those economic impacts are especially important to the rural communities that lie within the Adirondack Park.

Thank you for the opportunity for the Board to comment on this important issue.

Sincerely,

Jason Kemper, Chairman
NYS Conservation Fund Advisory Board

RECEIVED
ADIRONDACK PARK AGENCY
JUL 11 2022

7/6/22

ANY PURCHASE OF LAND SINCE 1972 SHOULD BE SUBJECTED TO A % OF ROAD ACCESS SO PEOPLE CAN USE THE LAND N.Y.S. HAS AQUIRED WITH OUR TAX DOLLARS! LESS ROAD MILAGE MEANS LESS ACCESS AND PUTS MORE PRESSURE ON FRINGES OF ADK. PARK. I DISAGREE WITH ANY PROPOSAL THAT MAKE ACCESS TO ADK. PARK MORE LIMITING! PUT PEOPLE FIRST FOR ONCE!

CHRIS & ROBIN COLLINS
275 PUMPKIN HOLLOW RD
WELLS N.Y.

CHRISTOPHER & DANA REEVE FOUNDATION
TODAY'S CARE. TOMORROW'S CURE.

Margaret F. Goldberg, President & CEO

July 5, 2022

Megan Phillips, Deputy Director for Planning
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Via email to: SLMP_UMP_Comments@apa.ny.gov

RE: Adirondack Park State Land Master Plan

Dear Ms. Phillips,

It is our understanding that since the 2001 *Galusha* settlement, the geographical area has been significantly expanded by the state's purchase of additional land with roads.

The Christopher & Dana Reeve Foundation therefore supports **"Road Alternative 2 – CP3 not included,"** as this allows for the necessary and appropriate disability access.

Mileage should increase in proportion to the expansion to equitably provide accessibility to those additional areas for the disability community. Notably, doing so would do no harm to the environment and have no adverse impact.

Thank you for your attention and careful consideration of this matter which is of great import to the paralysis community and those living with physical or mobility impairments.

Sincerely,

Margaret F. Goldberg

636 Morris Turnpike, Suite 3A, Short Hills, NJ 07078 • 1 800 225 0292 • 973 379 2690 • Fax 973 912 9433
• ChristopherReeve.org

1473 River Road
North Creek, NY 12853
July 9, 2022

RECEIVED
ADIRONDACK PARK AGENCY
JUL 11 2022

Ms. Phillips, and others with the power to change the course of history in the Adirondacks:

"If there is a unifying theme to the master plan, it is that the natural resources of the state lands within the Park **must be paramount.** Human use and enjoyment of those lands should be permitted and encouraged, s**o long as the resources in their biological context as well as their social or psychological aspects are not degraded."**

Doesn't that mean that human users have a right to expect natural **wildness** to be the overall character of the forest preserve? Unnecessary roads and motor uses should not be expected by visitors in a "forever wild" forest because **they degrade the natural environment wherever they go.** Roads that were here in 1970 often have to be accepted and even appreciated, but instead of looking for ways to increase road mileage, the APA and DEC should be looking for ways to lessen their mileage and impacts, except on easement lands. Many kinds of "roads" are throughout the whole Park, not just in so-called "Wild Forest". They should all be inventoried and minimized where possible.

Unfortunately the word "wild" lost its meaning in 1972 when **Motorized** (Wild) Forest was created. Now most people accept that the word "wild" can include even elitist recreational vehicles because the writers of the State Land Master Plan who were under intense pressure from the new snowmobile business **destroyed all meaning of that word** which before 1972 was the adjectival form of "wilderness". "Wilderness" in the forest preserve now means "not motorized", but the "wild forest lands" of the amendment did NOT mean motors would have been acceptable on trails in 1894. The terms were used interchangeably then!

David Mclure in his speech to argue for the forever wild amendment in 1894 used the term "peace and quiet" to describe what the forest preserve should be--a haven for stressed people needing to escape the noise, odors, and frenetic life of urban and other settled areas of the late 1800's. Even then steam engines were something to escape, and the clatter of horses hoofs on cobblestones, with the ever present manure odors made the pure air and waters of the Adirondacks seem to be a vision of heaven.

What would our forefathers think of the 50 years now of screaming, speeding, air polluting, affordable and usable only by affluent men, dangerous, modern machines running throughout the Park, including on the forever wild forest preserve? Calling snowmobiles a "Wild" use does not make them one. They were "snuck in" by Commissioner Harold Wilm in a coup and he got away with it.

Now, with climate change making snowmobiling the first winter recreation to be lost according to Jerry Jenkins because of undependable snow cover, is not the time to spend more resources on expanding the routes. The end is in sight! Develop the low country routes usurped by machines for skiing and snowshoeing interconnected routes with plowed out parking spots for the children, very old and very young, women as well as men. Old Forge so far can benefit financially because of town lands laced with trails, paid registrations for the use and—SNOW! Right now the southeastern Adirondacks should be crossed off public financing for an invasive, disruptive for wildlife who have to make their livings at night, **elitist, dying** sport. During the Covid crisis, we all know there has been a huge uptick in people appreciating the chance for healthful, physically active, recreation which is good balm for the mental stresses we have been through. Please, take the SLMP mandate to heart!

Evelyn Greene

ADIRONDACK PARK
LOCAL GOVERNMENT REVIEW BOARD

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July 11, 2022

Megan Phillips. Deputy Director

Thank you for the opportunity to comment on the Road Milage issue in Wild Forest.

The APA and DEC should be applauded for the open presentations they have done to help educate the public on a very complex topic. Which is further complicated by the previous 49 years of management decisions that have been made to allow public access on Wild Forest lands acquired after implementation of the APA ACT.

The benefit of addressing Wild Forest mileage now, gives us 20/20 vision looking at the past. The past tells us the SLMP and the management decisions were legally questionable, based on the passage of the Americans with Disabilities Act which was signed on July 26, 1990. The adoption of the ADA highlighted that the SLMP and management of the Forest Preserve could be discriminatory.

Unfortunately, not until Ted Galusha was ticketed in 1995, was New York States resistance to allowing access for the disabled brought to the attention of the public. We know access was granted to the disabled through Temporary Revocable Permits for a couple of years, then a decision was made to no longer allow this access to the disabled. Forcing the disabled to sue the State in Federal Court in 1998. Which resulted in the settlement agreement DEC must now follow to this day.

The history on access to the disabled is pretty clear. After July 26, 1990, the management decisions about access for the disabled was not only morally wrong, it was illegal. I respectfully ask the APA Commissioners to look to the history of the treatment of the disabled prior to the Galusha decision. I further ask the Commissioners to NOT include Galusha settlement milage, currently 21.5 miles as part of the total mileage in Wild Forest. Further, all current and future CP3 mileage should NOT be counted in total mileage of Wild Forest. CP3 holders are of the same protected class as the participants in the Galusha decision.

The most complex part of the decision in front of the Commissioners is codifying what miles existed on Wild Forest in 1972, what is a material increase of those milesand how does one evaluate material increase in light of the fact the Forest Preserve is larger today than in 1972.

50 years after the SLMP claims there should not be any material increase of Road mileage in Wild Forest, that existed in 1972. DEC attempted to answer the question of what existed in 1972. There was no inventory of Roads in 1972. There were no official state records of what Roads existed in 1972. Many miles of Roads open in 1972 were Administratively closed, therefore grown back in, and difficult to determine where the beginning and ends are. Mapped exclusively by satellite. This mapping, has been called in question by many local Governments. Who have contested Road inventories being reduced by satellite mapping by New York State. Many of these Local Governments have, by using an on the ground measuring wheel had their lost inventory reinstated. Many Local Governments find past satellite measurements of roads untrustworthy technology.

It is past time for the Commissioners to codify the miles that existed in 1972, until the presentation on this issue, the Road Miles that existed was a closely held State secret. It is time for more openness in the management of the

Adirondack Forest Preserve. My only request, as you codify what existed in 1972, is, that you are aware that 211.6 miles is only a best guess.

The decision on what is a material increase is the most difficult in front of you. While one can amakea case for a 15% increase. Depending on your actions, on the Galusha settlement, and CP3 miles, it might not be enough.

The SLMP is quiet on whether the miles that existed in 1972, should be absolute, and used as a cap for all future Wild Forest classified purchases that happened after 1972. It is also quiet on the possibility as new Wild Forest lands were acquired, the Road milage should increase by the number of miles that existed on those lands in 1972 or at the time of state acquisition. It seems Staff made the determination to view what existed in 1972 on wild Forest as an unpublished cap. The Public was promised Roads that existed in 1972 would be open. As new Wild Forest acquisitions were made. A decision was made to close some of these Roads, so the newly acquired Wild Forest could have miles to allow access. Thus, the State took access from one community to give to another. We can debate the reasons for closure, ultimately, those miles were moved to other parcels.

After many discussions with multiple groups, many stakeholders feel there should be the same density of roads on Wild Forest as existed in 1972, in all subsequent land acquisitions that have been classified Wild Forest.

Some stakeholders feel that Roads that were in existence on Wild Forest lands that were acquired after 1972, should be added to the “cap”.

My belief, is that a more practical solution should be adopted. Going forward, all Wild Forest lands without a UMP, or future purchases of Wild Forest lands, through the UMP process, APA and DEC staff should determine what mileage of Roads that are needed for appropriate access for all to the Unit. Once the UMP is approved, by the APA Commissioners, the Mileage will increase by that amount. If all or part of these Roads approved are closed, the milage is removed, and not available for transfer to another parcel. This process would allow the Lands to “speak” to access. The UMP process is open, comments are solicited. UMP’s are often changed to reflect the public comments concerns. This process would be more open, and allow for better informed public comment than the current process has. I ask you to consider a solution that does not create winner and loser communities. The winner and loser process has been used for 50 years. Much to the displeasure of the loser communities.

In closing, I ask you not to consider Galusha settlement and CP3 as open to the public.

When codifying the Miles of Wild Forest Roads in existence in 1972, acknowledging that 211.6 miles is a best guess based on limited doucumentation.

Codify a process to allow for future growth of the Forest Preserve, which creates road miles as needed and replace the current Winner and Loser system that is currently in use.

Sincerely,

Gerald Delaney

Executive Director

July 12, 2022

Megan Phillips, Deputy Director for Planning
Adirondack Park Agency
1133 Route 86
Ray Brook, NY 12977

Re: State Land Master Plan – Wild Forest Roads – No Material Increase Policy

The Adirondack Park Agency is currently examining an issue that one local reporter has referred to as a "half-century conundrum." On the question of road mileage in Wild Forests, the language in the State Land Master Plan is ambiguous. The resulting uncertainly is a barrier to effective policy development and land management. Given the Agency's responsibility "as a policy matter, for general interpretations of the master plan"—as established by precedent and acknowledged by the SLMP, itself—it is appropriate for the Agency to clarify the meaning of SLMP language related to the public's access to and the state's management of woods roads on state Wild Forests.

The Park Agency Board should establish that the SLMP's Wild Forest Basic Guideline 4, read together with the Wild Forest Roads and Administrative Roads Guidelines 3 and 4, is to be understood as a three-part guideline: (1) policy should not promote motor vehicle use as primary recreational activity, but need not actively discourage it where such use is compatible with the objectives of the SLMP and the purpose of the Act; (2) the mileage of roads in Wild Forest open to public vehicle traffic should not exceed the sum of road miles existing and in use at the time that each tract of Wild Forest first came under the authority of the SLMP (i.e. 1972 for land initially designated Wild Forest and the date of acquisition for subsequently acquired land); and (3) new roads should be constructed only when "absolutely essential" and a corresponding length of existing road should be decommissioned from Wild Forest elsewhere in the Forest Preserve.

Compared to any of the other interpretations that have been suggested, the interpretation of Basic Guideline 4 suggested above is more reasonable and clearly more consistent with the stated purpose of the APA Act and the Agency's mandate. The language of Basic Guideline 4 is ambiguous, but a subsequent guideline—Wild Forest Roads and Administrative Roads Guideline 3—is clearer: "established roads … in newly-acquired state lands classified as wild forest may be kept open to the public, subject to basic guideline 4." The "subject to basic guideline 4" clause is best understood in reference primarily to the first part of that guideline ("Public use of motor vehicles will not be encouraged"). Existing roads may remain open, but the DEC should not promote "travel by jeep" as a main form of recreation. Sorry, mudders.

The language in Roads Guideline 3 would make little sense if its intent was to force road closures whenever Wild Forest land with open roads was added to the Forest Preserve. "Established roads … may be kept open" is an odd way to make the point that they will actually have to be closed unless some other stretch of road is closed elsewhere in Wild Forest. In fact, a close textual reading of the later part of Basic Guideline 4 leads to the conclusion that the guideline is silent on road mileage in newly acquired Wild Forest lands. Where the guideline states "there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public" it qualifies this restriction as applying only "in

wild forest areas that conformed to the master plan at the time of its original adoption in 1972". A million miles of road could be constructed in Wild Forest acquired after 1972 but there would nonetheless be no increase in the mileage of roads "in wild forest areas that conformed to the master plan … in 1972". Of course, no one is arguing for such a policy. A more reasonable interpretation of the intent of Basic Guideline 4, as referenced in Road Guideline 3, is that the principle it establishes—that there should be in increase in road mileage beyond that already in use when a parcel comes under the authority of the SLMP—should also extend to newly acquired land.

Technical questions of interpretation aside, it is worth briefly noting the broader merits of a more permissive reading of the SLMP guidelines. The fundamental purpose of the APA Act was "to insure optimum overall conservation, protection, reservation, development and use of the unique scenic, aesthetic, wildlife, recreational, open space, historic, ecological and natural resources of the Adirondack park." It explicitly recognizes the *complementarity* of the state's interest in open space and natural resource preservation, on the one hand, and Adirondack residents' interest in "growth and service areas, employment, and a strong economic base" on the other. The APA Act envisions resource protection and economic growth as complements—that neither is satisfactory or complete without the other. Growing a robust Adirondack economy will depend on creating a more inclusive and more accessible Forest Preserve that provides more points of entry and allows for a wider variety of uses than just the daunting High Peaks hikes the region is best known for. Wild Forest lands with pre-existing woods roads can help provide those alternative opportunities.

The SLMP defines Wild Forest, in part, as "an area that frequently lacks the sense of remoteness of wilderness, primitive or canoe areas and that permits a wide variety of outdoor recreation." Clearly, the "social and psychological aspects" of these lands are not at risk of being degraded by occasional motor vehicle use. Similarly, the "the resources in their physical and biological context"—the protection of which the SLMP identifies as its unifying theme—do not appear to be threatened by the continued, infrequent use of already-established roads. The SLMP identifies land designated Wild Forest as categorically "less fragile" than most other state land, with resources that "can withstand more human impact". By the SLMP's own evaluation, Wild Forest lands are well positioned to accommodate light motor vehicle use. The costs of permitting such use appear to be low but the benefits could be substantial.

As a final note, please keep in mind that a decision by Park Agency Board to adopt the SLMP interpretation offered above would not in any way oblige DEC to keep any road open that, in their professional judgement, did not serve the public interest. Increasing a cap is not the same as establishing a floor. This interpretation would simply give DEC staff more scope to exercise their judgement in weighing the relative costs and benefits of any given policy or management decision relating to woods road use, access, or maintenance.

I urge the Agency to give serious consideration to the SLMP interpretation suggested above.

Respectfully,

John Foppert
Saranac, New York

No Material Increase of Road Mileage on Wild Forest: Public Comments

My name is Jason Thurston. I am a 30-year resident of the Adirondack Park and a quadriplegic due to a diving accident 18 years ago. Since then, I have been a power wheelchair user. I am the outreach coordinator for John Dillon Park in Long Lake, a camping and wilderness area designed for people with disabilities, as well as the chairman of the Accessibility Advisory Committee (AAC) to the DEC and the APA. I also serve on the Adirondack Forest Preserve Advisory Committee as a representative of the AAC.

I understand the complexity in balancing accessibility and environmental protection. I believe that they can go hand-in-hand and have first-hand experience in this endeavor through my work at John Dillon Park. Access leads to increased environmental awareness and conservation; people with disabilities understand how fragile life can be, as thus, have a unique perspective on human impacts to the environment. I believe in as much access as possible for people with disabilities, in balance with preserving the unique natural character of our forest lands. Equal access is something that is not only the law, but it is the right thing to do.

When the CP-3 program was set up, times were different. Today, there are many more power-driven mobility devices on the market. Track chairs, four-wheel-drive wheelchairs, electric powered devices, and so on. I believe it is time to revisit the way that access is granted to people with disabilities. The AAC stands ready to work with the APA and DEC in evaluating and revising accommodations and policies, static for over two decades since the time of the Galusha settlement, to reflect the current interests of the ever-expanding numbers of people with mobility limitations and modern modes of access.

In my role in promoting regional tourism with ROOST and John Dillon Park, I can attest that people with mobility limitations recreating in the Adirondacks are looking for increased pedestrian access and opportunities to use e-mobility devices, so that they have more equitable opportunities for quiet enjoyment of the outdoors. I understand the concern with no-material increase of road mileage and propose that DEC and APA staff and the AAC, in consultation with representatives of CP-3 permit holders, open the discussion to a broader range of options. We could discuss alternatives on how to best meet diverse needs of people with mobility limitations e.g., *would it serve the community to substitute portions of CP-3 mileage with accessible trails and routes for other power-driven mobility devices*. I also refer you to the comments submitted by my fellow committee members, including Katherine Carroll and Scott Remington, for the full range of topics we would like to discuss with you.

I would also like to take this opportunity to mention the need to provide greater accommodation to certain truly unique places in New York State, such as Great Camp Santanoni. Accessibility to Great Camp Santanoni is appropriately called out in the Galusha settlement for specific accommodation for people with disabilities. However, the ongoing issues and interruptions with consistent accessible horse and wagon service obligate us to continue to evaluate accessibility to this site. We acknowledge and

appreciate that DEC took recent action to replace the accessible wagon and ask that is made available as soon as possible. However, the AAC continues to be concerned about the reliability of the service moving forward, as well as associated schedule limitations. We would like to discuss this site as we reevaluate specific accommodations in the Adirondacks and consider mobility devices that would allow more equitable and independent forms of access, consistent with the historic and natural character of the site.

I am requesting the Board take its time before any decision to directly engage the Accessibility Advisory Committee, as the designated body representing the people with disabilities, and for us together to reach out to CP-3 route users for their feedback. The AAC proposes that a series of meetings be scheduled between us and DEC and APA staff to evaluate a greater range of options, such as I describe above and those submitted by other AAC members, and put forward a plan that proactively addresses expanding access based on current needs of people with disabilities. I look forward to continued collaboration with the APA and the DEC to meet our shared objective of balancing accessibility for all with preservation of our forest environments.

MAYOR
Jeannette A. Barrett, PhD

TRUSTEES
Mark Donecker
Cindy Rumsey
Jim Rumsey
Rebecca Smith

SUPT. OF PUBLIC WORKS
Roger E. Blanchard, Jr

WWTP / WATER CHIEF OPERATOR
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VILLAGE CLERK-TREASURER
Crystal L. O'Brien

THE VILLAGE OF SPECULATOR

PO Box 396 – 2875 State Route 8
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July 12, 2022

Megan Phillips, Deputy Director for Planning

Adirondack Park Agency

P.O. Box 99

Ray Brook, NY 12977

Dear Ms Phillips,

Thank you for the opportunity for allowing Local Government and individuals to comment on pending interpretations of the State Land Master Plan. The proposed alternatives will not address all the inequity that has been placed on the residents living within the Adirondacks. Given the limitations of what has been presented, I would support the following:

1. NMI Alternative 2: Increase more than the proposed 15%. The increase should be tied to the percentage of land that NYS has acquired since 1972.
2. Road Alternative: CP-3 not included
3. The "Galusha/CP-3" road mileage should be excluded from all mileage caps. To do so would be a continuation of discriminatory actions. Using one user group to discriminate against another with an arbitrary mileage cap is definitely not what the Court envisioned in its judgement.

New York State has curtailed economic, social development as well as diversity within the Adirondack Park for decades with its outdated and discriminatory State Land Master Plan. The Regulatory Agencies that are tasked with enforcement and interpretations of this draconian document are stuck in past practices and policies, when they should be focused on the present and future of the Adirondack Park and its residents. I ask, on behalf of our residents, to codify a process to allow for future growth of the Forest Preserve, which creates road miles as needed and replace the current Winner and Loser system that is currently in use.

Sincerely,

Jeannette Barrett

Mayor, Village of Speculator

The Village of Speculator is an Equal Opportunity Provider and Employer.
If you wish to a Civil Rights program file a complaint of discrimination, complete the USDA Program Discrimination Complaint Form online at http://www.ascr.usda.gov/complaint_filing_cust.html *or at any USDA office or call (866)632-9992 to request the form. You may also write a letter containing all the information requested on the form. Send your completed complaint form or letter to USDA by mail at USDA, Director, Office of Adjudication, 1400 Independence Avenue, S. W., Washington, DC 20250-9410 or by fax (202)690-7442 or email program.intake@usda.gov*

New York State Snowmobile Association

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July 11, 2022

The New York State Snowmobile Association (NYSSA) would like to take this opportunity to submit comments regarding Adirondack Park State Land Master Plan's Wild Forest Basic Guideline No. 4 – no material increase of road mileage on lands classified as Wild Forest. We appreciate the APA for allowing for this public comment period. NYSSA currently has over 55,000 memberships representing over 100,000 snowmobilers that belong to over 220+ snowmobile clubs in New York State. Many snowmobilers travel to the Adirondacks for the experience. Our organization strives to preserve that opportunity for snowmobilers in NY. We also advocate for safe and enjoyable riding for all snowmobilers. Snowmobilers provide economic benefits to many businesses in the Adirondacks and are crucial to the survival of these communities. NYSSA would like the agency to consider future changes and how they will impact the snowmobile plan. Our position is that a "material increase" would have to be significant to impact the character of the Wild Forest Land. Snowmobile trails account for less than 1,000 acres of the Forest Preserve, allowing some increase in snowmobile trail mileage should be considered in the future as it would not change the character of the Park.

The Adirondack Snowmobile Plan recommends that trails be located on private land whenever possible. On October 19, 2007, NYSDEC Commissioner stated the cap was not a hard cap and not accurate. He suggested that any trails on lands acquired by NYS after 1972 should be added to the cap. Therefore NYSSA recommends all trail mileage located on private lands at the time of purchase to NYS be added to the mileage cap limit. For example, the mileage cap is now 848.88. If NYS purchases a parcel with 30 miles of existing snowmobile trail, the cap ceiling should be raised to 878.88. We are concerned that the cap on snowmobile trail mileage based on 1972 mileage estimates does not consider the acquisition of hundreds of thousands of acres by NY since 1972. The trail mileage limit should correspond with the number of acres the state owned then and now. New land acquisitions should allow proportional material increase allowances to enable access to the new land by recreational enthusiasts and disabled parties that would like to enjoy all the Adirondack Park has to offer. Not allowing any mileage increase would limit the areas that those of all abilities could enjoy.

DEC stated that both APA and DEC staff completed an inventory of trail mileage they believed to be available in 1972 and both DEC and APA came up with the mileage figure of 740 (using different methods) available in 1972. DEC suggests that as various UMP's are completed, with many having trails closed, it will be a considerable time before we approach the 848.88 limit. NYSSA is concerned about how this policy will affect future generations of snowmobilers and that important trails will be closed to avoid reaching the mileage cap limit.

In addition to new land acquisitions, environmental issues may also increase trail mileage. For instance, the Adirondack Snowmobile Plan recommends we avoid wetlands, steep slopes and other sensitive areas. This may result in a rerouting of the trail, which could potentially add mileage. The Adirondack Snowmobile Plan also recommends rerouting trails to the periphery of particular units that more than likely will add mileage. Another issue is safety; again, the Adirondack Snowmobile Plan recommends that trails not end at a lake and that they be rerouted to go around the lake, which will result in more mileage being added. If in the future there was a need for one way trails, there would also have to be additional mileage added to the cap. NYSSA recommends that any additional mileage added to the snowmobile trail system because of environmental or safety concerns should result in the mileage cap ceiling being increased.

Any snowmobile trails currently on Motor Vehicle Roads open to the public should not be counted toward the cap as these roads are open to motor vehicles in the non-winter months. This should also include any snowmobile trails that are not on motor vehicle roads. NYSSA recommends that snowmobile trails on motor vehicle roads not count toward the mileage cap ceiling.

NYSSA suggests a solution to future land acquisitions. In the past, NYSSA has supported the state in purchasing easements as they have added permanence to our snowmobile trail system. There is a concern that the easements are a first step toward the state owning these lands in fee. Thereby, any snowmobile trails on these properties would suddenly count toward the mileage cap. NYSSA recommends that all future easements or purchases include language that will convey snowmobile trails to municipalities on newly acquired acquisitions

Thank you for the opportunity to submit our comments.

Sincerely

Jennifer Senf

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July 12, 2022

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: NYS Adirondack Park Agency interpretation of the Adirondack Park State Land Master Plan's Wild Forest Basic Guideline No. 4 – no material increase of road mileage on lands classified as Wild Forest

Dear Ms. Phillips:

In coordination with the Department of Environmental Conservation (DEC), the Adirondack Park Agency (APA) is holding a public hearing seeking input regarding an official "interpretation" of the Adirondack Park State Land Master Plan (APSLMP) Wild Forest Basic Guideline No. 4. The way that the APA-DEC chooses to "interpret" this part of the APSLMP will have a major impact on the future of 1.3 million acres of the Forest Preserve classified as Wild Forest. Wild Forest Basic Guideline No. 4 states:

Public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972. (p. 36)

In hearing materials provided to the public, the APA states: "The interpretation of Basic Guideline No. 4 will establish a baseline for road mileage on Wild Forest classified lands. The interpretation of this guideline of the Adirondack Park State Land Master Plan will better inform and support the development of Unit Management Plans (UMPs) that conform with the Adirondack Park State Land Master Plan." In hearing documents the APA has posted four questions to the public with regards to how it should interpret Wild Forest Basic Guideline No. 4. These questions are:

1. What was the existing road mileage on lands classified as Wild Forest in 1972?

2. What is the existing road mileage on lands classified as Wild Forest today?

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3. What constitutes a material increase in road mileage?

4. Does the Department of Environmental Conservation Commissioner's Policy-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

DEC-APA analysis tells us that there are now 206.6 miles of public roads open in Wild Forest areas in 2022, which they say is down slightly by five miles from the 1972 total of 211.6 miles. This number does not include administrative roads in Wild Forest areas managed by the DEC or roads where there are private access rights. Public hearing materials did not provide data on the total mileage of these roads in Wild Forest areas, which is considerable. Nor does this figure include the total mileage of roads open to the public for motorized access under the "Galusha" settlement/NYSDEC CP-3 policy for disabled access. In this way, the total scope of roads in Wild Forest areas, and their total impact, is not being considered.

The APSLMP is predicated on natural resource protection. Human "use" of the Forest Preserve is referenced in many sections as needing to be limited in order to protect natural resources as well as uphold and vouchsafe a series of human values for solitude and wildness. There is no more disruptive use in the Forest Preserve than a motor vehicle and the road that allows its penetration into wild areas and intact forests. The APSLMP was clearly written to limit roads and motorized use even as the Forest Preserve continued to grow and expand.

The ways that the APA-DEC choose to frame and answer the questions above will have far-reaching impacts on the natural resources and public use of the Forest Preserve. Protect the Adirondacks believes that Wild Forest Basic Guideline No. 4 needs to be evaluated and interpreted in concert with other relevant parts of the APSLMP that specifically direct Forest Preserve managers to limit the mileage of roads on the Forest Preserve. Protect the Adirondacks believes that Wild Forest Basic Guideline No. 4 pertains to all roads in Wild Forest areas, whether public, administrative, or roads open to the public under the DEC CP-3 policy for disabled access. We are concerned that the APA-DEC's decision not to include administrative roads and CP-3 roads in its road mileage totals in Wild Forest areas is an effort to circumvent and work-around the restrictions in the "no material increase" clause.

As the APA-DEC assesses the meaning of Wild Forest Basic Guideline No. 4, they also need to look at the hundreds of miles of public motor vehicle roads open on state-owned conservation easements and those in other Forest Preserve classes, which have a direct bearing on this issue. Protect the Adirondacks is also concerned about the APA's decision to formally interpret Wild Forest Basic Guideline No. 4 at this moment in time because it fits with a pattern over the last dozen years where the APA has assiduously worked to expand public and state administrative motor vehicle access to the Forest Preserve.

It's important for the APA-DEC to understand that there is no greater negative impact to an intact forest system than building a road. At the federal level, the "roadless rule" is being resuscitated and implemented in 2022, after having been gutted by the Trump Administration. New York State should not work extend the policies of the Trump Administration to our Forest Preserve. APA-DEC have already exceeded the mileage cap in Wild Forest Basic Guideline No. 4.

In the 2021 Court of Appeals decision in Protect the Adirondacks v. APA and DEC, that found that the APA and DEC violated Article 14, Section 1, of the State Constitution, a majority of justices wrote "The forever wild provision ensures the preservation of state-owned land within the Adirondack Park (and Catskills) in its wild state" and that the "ultimate objective of protecting the forest as wilderness" is the paramount purpose of Article 14. When the Court of Appeals looked at how the APA-DEC attempted to justify their actions in trying to build a network of Class II Community Connector Snowmobile Trails the Court wrote "defendants [APA/DEC] … contend that the project's impacts are justified because it enhances access to the Preserve and provides a variety of recreational opportunities. That analysis proceeds from a fundamental misunderstanding. The constitution provides for access and enjoyment of the Forest Preserve as a wild forest: 'very considerable use may be made by campers and others without in any way interfering with this purpose of preserving them as wild forest lands'."

The Court specifically found that Class II trails were unconstitutional in large part because "the trails require greater interference with the natural development of the Forest Preserve than is necessary to accommodate hikers" and that "their construction is based on the travel path and speed of a motorized vehicle." The Court plainly shattered any argument about the necessity for motorized access to the Forest Preserve and the facilities that make such access possible. A fair reading of Wild Forest Basic Guideline No. 4 is that it is designed to expressly limit roads on the Forest Preserve as required by Article 14. If the APA-DEC make an erroneous interpretation of Wild Forest Basic Guideline No. 4, and ignore the many miles of administrative roads and CP-3 roads, and enables approval of many miles of new roads in the future, this would also likely result in a violation of the Constitution.

"No Material Increase" Clause and the Adirondack Park State Land Master Plan

Protect the Adirondacks believes that the "no material increase" clause in Wild Forest Basic Guidelines No. 4 should be read in context with other parts of the APSLMP, including other Wild Forest guidelines and formal definitions. We urge the APA not to make a narrow reading of the APSLMP but to understand its full and integrated scope and intentions.

Programmatic Environmental Impact Statement for APSLMP: The 1979 Programmatic Environmental Impact Statement (PEIS) governs the amendment process for the APSLMP. The PEIS states that "Wilderness is the cornerstone of the Master Plan" (p. 31). The PEIS states "Wilderness recreational opportunities are scarce in New York and rare in the northeastern United States. Adirondack wilderness constitutes only 3% of New York State, and 91% of all designated wilderness in the Northeastern United States. Intensive recreational opportunities are relatively abundant throughout the State and are provided by both the public and private sector which often compete." (p. 5) The PEIS should be consulted when the APA undertakes a formal interpretation.

The PEIS made the statements above because what's special and vital about the Adirondack Forest Preserve is that it's rare and unique in its size and scope in the U.S. east of the Mississippi River. We have over two million miles of paved roads east of the Mississippi River, built on over six million acres of asphalt, but just two million acres of Wilderness. The Adirondack Forest Preserve is the greatest mass of wildlands and Wilderness in the east, where the only other major wildland areas are the Florida Everglades National Park at 1.5 million acres, Great Smoky Mountains National Park at 522,000 acres, and the Okefenokee Swamp National Wildlife Refuge at 400,000 acres.

The PEIS, which is a foundational document for the APSLMP, noted that there is no greater impact to a wildlands setting, the wild character of an area, or to the natural resources of an area than motorized uses and access. This is precisely why the APSLMP prohibits motorized access in Wilderness Areas and tightly regulates and effectively caps motorized access in Wild Forest Areas in the Forest Preserve.

Wild Forest Basic Guideline No. 4 is a Cap on Roads: The PEIS highlights the importance of Adirondack Wilderness and the Adirondack Forest Preserve in the eastern U.S. It makes the case that there are lots of places to pursue motorized activities, but east of the Mississippi River there are precious few places for wild experiences and where wild nature can flourish largely unfettered by humans.

It's important for the APA-DEC not to interpret Wild Forest Basic Guideline No. 4 in a vacuum. Wild Forest Basic Guideline No. 1 is also important as it lays out the "primary" requirement for Forest Preserve managers in Wild Forest areas: "The primary wild forest management guideline will be to protect the natural wild forest setting and to provide those types of outdoor recreation that will afford public enjoyment without impairing the wild forest atmosphere." There is no other "type of outdoor recreation" that impairs the "wild forest atmosphere" more than the noise, speed, dust, fumes, and mechanical intrusion of motor vehicles in a forest area, and the wide roads cut through forests to facilitate them. How is it that the APA-DEC are complying with the requirements of Wild Forest Basic Guideline No. 1 when it seeks to expand the mileage of roads in Wild Forest areas?

Wild Forest Basic Guideline No. 4 should be read as an effective cap on the mileage of roads in the Forest Preserve. In the framing of the APSLMP, motor vehicle roads were to have been closed in Wilderness areas and were to be rare in all other places. The language in Wild Forest Basic Guideline No. 4 is deliberate that "public use of motor vehicles will not be encouraged" in the Adirondack Forest Preserve. To strengthen this point, it says "there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972." (p. 36) This should be read as a functional cap on road mileage in Wild Forest areas in the Forest Preserve. As we show below, we think the APA-DEC is misreading Wild Forest Basic Guideline No. 4 and that this clause clearly covers all roads in Wild Forest areas.

Definition of a Road: The way that motorized use is regulated on the Forest Preserve in the APSLMP starts with the definition of a "road." The APLSMP defines a road this way:

> Road--an improved or partially improved way designed for travel by automobiles and which may also be used by other types of motor vehicles except snowmobiles, unless the way is a designated snowmobile trail; and is,
>
> (i) either maintained by a state agency or a local government and open to the general public;
>
> (ii) maintained by private persons or corporations primarily for private use but which may also be open to the general public for all or a segment thereof; or,

(iii) maintained by the Department of Environmental Conservation or other state agency and open to the public on a discretionary basis.

This definition has a direct bearing on the APA-DEC interpretation of the no material increase clause. The road definition is broad and all-encompassing. Its wide scope is deliberately stated as "an improved or partially improved way," which is designed to cover all motor vehicle routes, whether they are "maintained by a state agency or a local government and open to the general public." The all-encompassing definition includes the full length of any roads located in FP maintained by private persons or corporations, if any segment thereof is open to the public. This definition deliberately includes all roads whatsoever on the Forest Preserve, whether maintained by a state agency or other entity, and whether or not they are open to the public. In essence, this practical application of this definition means that if it looks like a road, is used by motor vehicles under any circumstance as a road, and is maintained like road, then it's a road.

APSLMP goes further than just "roads" and also deliberately and importantly defines "administrative roads" this way:

> Administrative Roads--an improved way maintained by the Department of Environmental Conservation for the principal purpose of facilitating administration of state lands or of allowing access for firefighting equipment and not normally open for public use of motorized vehicles. This type of road has been called a State Truck Trail in older editions of this Plan. (p. 17)

The purpose of including this definition in the APSLMP is to highlight the fact that even roads where public use is limited by the DEC are indeed roads on the Forest Preserve. Once again, if it looks like a road, is used by motor vehicles under any circumstance as a road, and is maintained like road, then it's a road.

Structure and Improvements: The APLSMP provides further requirements for Forest Preserve managers on this matter in the "Structure and Improvements" guidelines in the Wild Forest section. This section lists "roads, and administrative roads" together because they are to be considered one and the same. While "roads, and administrative roads" are allowable structures and improvements, they are regulated tightly: "The maintenance and rehabilitation of the following structures and improvements will be allowed to the extent essential to the administration and/or protection of state lands or to reasonable public use thereof but new construction will not be encouraged." Hence, roads must be "essential" and "reasonable" and "construction will not be encouraged." We believe that this clause effectively prohibits the construction of new roads in the Forest Preserve and that road mileage should be minimized.

Roads and Administrative Roads: The APSLMP lays out yet more requirements to Forest Preserve managers in the "Roads and Administrative Roads" section in the Wild Forest section. The APSLMP lays out the following requirements:

1. Continued use of existing roads, snowmobile trails and administrative roads by administrative personnel in wild forest areas will be permitted, to the extent necessary, to reach, maintain and construct permitted structures and improvements.

2. Existing roads or snowmobile trails, now open to and used by the public for motor vehicle use in wild forest areas, may continue to be so used at the discretion of the Department of Environmental Conservation, provided such use is compatible with the wild forest character of an area.

3. Established roads or snowmobile trails in newly-acquired state lands classified as wild forest may be kept open to the public, subject to basic guideline 4 set forth above and in the case of snowmobile trails to the special guidelines for such trails set forth below, at the discretion of the Department of Environmental Conservation, provided such use is compatible with the wild forest character of the area.

4. No new roads will be constructed in wild forest areas nor will new administrative roads be constructed unless such construction is absolutely essential to the protection or administration of an area, no feasible alternative exists and no deterioration of the wild forest character or natural resource quality of the area will result. (p. 38-39)

These passages show that while the APA-DEC have limited discretion on where to allow roads, they are allowed only "to the extent necessary" and must be "compatible with the wild forest character of an area." Roads on newly purchased lands may be "kept open to public" subject to the "no material increase clause" and at the "discretion" of the DEC if they are "compatible with the wild forest character of an area." This section was written in recognition that nothing changes wild forest character more than motor vehicles, which are highly disruptive to natural and wild areas. This is the central reason why motor vehicles are expressly prohibited in Wilderness areas and why they must be minimized and rare in Wild Forest areas.

In total, while the APSLMP clearly intended to allow limited motorized uses in Wild Forest Areas in the Forest Preserve it also sought at the same time to cap and tightly regulate their use. A reading of all of the attendant parts of the APSLMP that regulate roads in Wild Forest areas shows that roads should not be expanded beyond the 1972 level no matter how much new Forest Preserve is acquired and classified as Wild Forest. The APSLMP was written with the intent to allow roads and motor vehicles only where absolutely necessary, but to sharply limit such use on the Forest Preserve.

A fair reading of the APSLMP requires that the total universe of roads in the Wild Forest areas, including administrative roads, be included in an assessment of Wild Forest Basic Guideline No. 4. By any rational standard administrative roads are roads in the Forest Preserve.

<u>Galusha Settlement/CP-3 Roads</u>

The DEC-APA have also decided not to include the universe of roads open to the public under special CP-3 permits. One part of the definition of a "road" in the APSLMP is roads "maintained by the Department of Environmental Conservation or other state agency and open to the public on a discretionary basis." CP-3 roads are clearly "open to the public on a discretionary basis." Furthermore, the CP-3 policy differentiates between "roads" and "trails." DEC only allows motor vehicles, such as pickup trucks or sedans, on roads, while some "trails" are open to All Terrain Vehicles. That CP-3 roads are maintained as such for discretionary public use means that they must be included in the road mileage totals under Basic Wild Forest Guideline No. 4.

A only fair reading of the APSLMP requires that the total universe of roads in Wild Forest areas, including CP-3 roads, be included in an assessment of Wild Forest Basic Guideline No. 4. Once again, it is our position that if it looks like a road, is used by motor vehicles under any circumstance as a road, and is maintained like road, then it's a road. By any rational standard CP-3 roads are roads in the Forest Preserve.

Public Roads and Conservation Easements

In assessing Basic Wild Forest Guideline No. 4, the APA-DEC should also consider the mileage of public roads opened on conservation easement lands in order to reduce the mileage on State lands wherever possible. The APSLMP makes reference to the importance of state-owned conservation easements and enumerates them in Appendix 2 where 699,442 acres of state easements are detailed. Regarding conservation easements, the APSLMP states:

> The State has acquired over the years a variety of conservation easements and less than fee interests which serve an important public purpose in preserving the natural character of the land for the benefit of the Park. Although the State owns various rights on these lands, the land remains in private ownership and is therefore not subject to the State land classification system and guidelines of the Master Plan.
>
> These less-than-fee interests are an important element in the relationship between state and private lands. In addition to state-held easements, private conservation organizations hold conservation easements over a significant acreage of private land, which also help preserve the natural, open-space character of the Park. This master plan for state lands has therefore attempted to take into account, both in the basic classification system and in the guidelines for future land acquisitions, this intermingling of private and public lands within the Park. (p 3-4)

The APSLMP clearly recognizes the importance of state-owned conservation easements in the Adirondack Park. Protect the Adirondacks estimates that there are over 900 miles of roads on state-owned conservation easements lands. Of these, we calculate that at least 500 miles of roads are open for some form of public motor vehicle use, though we note that the mileage of snowmobile trails is even greater. There are many cases where roads are connected between conservation easements and the Forest Preserve or where roads on easements provide public access to the Forest Preserve. From an administrative access standpoint, state agencies and personnel have carte blanche access to the full scope of roads on easement lands. The APA-DEC should not put on administrative blinders and pretend that throughout the Adirondacks, and mixed together like a patchwork quilt with Forest Preserve lands and roads, and somehow ignore or disregard the fact that the DEC has not prioritized the policy of the acquisition of public motorized use and access rights on conservation easement lands.

One fundamental purpose of state-owned conservation easement lands is that they have long been recognized as a recreational safety valve for the Forest Preserve where more intensive forms of motorized recreational uses are appropriate. This is why the state has sought to chiefly purchase extensive motor sports rights on easement lands to a far greater degree than any other type of recreational use. While motor vehicle roads are limited on the Forest Preserve, and correctly so, they are abundant, and continue to grow decade by decade, on state-owned conservation

easement lands. While the no material increase clause has capped road mileage in Wild Forest areas in the Adirondack Park, we've seen an ever growing mileage of public motor vehicle roads on conservation easement lands.

Roads in Primitive, Historic, Canoe, and Intensive Use Areas in the Forest Preserve

Protect the Adirondacks notes that the universe of various roads authorized on the Forest Preserve goes beyond Wild Forest areas and includes extensive mileage in Canoe, Historic, and Primitive areas. Beyond these areas, there's also an even bigger mileage of roads in Intensive Use areas, some of which, like Gore Mountain and Whiteface Mountain, are authorized through Constitutional Amendments, while other roads have been built over time, such as the many miles of roads in state campgrounds. Moreover, two other factors are important for the APA-DEC. First, APA-DEC created the new Intensive Use area along many miles of Cedar River Road, and makes no reference to how the mileage of that road, which still exists and still runs through the heart of the Moose River Plains Wild Forest, is no longer part of the APA's assessment of Wild Forest Basic Guideline No. 4. Second, it's important to note that in its zeal to continue to expand motorized use of the Forest Preserve, in 2016 the APA amended the APSLMP to allow an extensive road network in the Essex Chain Lakes Primitive Area.

The APA's framing of this public hearing solely within the context of Wild Forest Basic Guideline No. 4 does not address the total impact of roads within the Adirondack Forest Preserve or the overall intent of the APSLMP.

Four Questions Posed in the APA-DEC Public Hearing

The APA-DEC posed four questions for the public in this public hearing. Our responses to these questions are below.

What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

The APA-DEC has already answered these questions and tells us that in Wild Forest areas in 2022 there are 206.6 miles of public motor vehicle roads. The APA-DEC tells us that this number is down from a 1972 total of 211.6 miles. Protect the Adirondacks has not undertaken an independent field verification of the state's data. The state should provide its GIS files to the public for these road inventories.

Protect the Adirondacks finds that these totals do not tell the whole story and are inadequate to interpret Wild Forest Basic Guideline No. 4. The mileage of "state administrative" roads in Wild Forest areas must be included in these figures. We note that in the Moose River Plains Wild Forest Area UMP there are 3.22 miles of state administrative roads listed. In the Saranac Lake Wild Forest Area UMP there are 17 miles of state administrative roads listed. The Grass River Area Wild Forest UMP lists over 5.5 miles of administrative roads. Unfortunately, given the incomplete nature of how UMPs have been organized over time and limitations with what's posted online by the DEC, there's no easy way to complete this analysis to tabulate the total mileage of administrative roads, but it appears that the total miles of administrative roads in Wild Forest areas is considerable. We

call upon the APA-DEC to publish a list and mileage of all state "administrative roads" by Wild Forest unit in 1972 and 2022 as part of this public hearing.

Nor does the APA-DEC figure of 206.6 miles of 2022 Wild Forest roads include the total number of roads open to the public for motorized access under the "Galusha" settlement and CP-3 program. DEC data states that there is somewhere around 21 miles of roads open to the public through these special permits.

Protect the Adirondacks finds that the failure to include administrative roads and CP-3 roads in the total road mileage in Wild Forest areas is a misreading of the intent of the APSLMP and Wild Forest Basic Guideline No. 4. We believe that when the mileage of roads are combined that are open to the public in Wild Forest areas, available under CP-3, and are used as state administrative in Wild Forest they will total over 250 miles, which is far above any rational interpretation of a "material" increase in Wild Forest Basic Guideline No. 4.

It is also worth noting that there is nothing in the APA-DEC public hearing materials on this question about the transfer of considerable mileage of Wild Forest roads to an Intensive Use area when the Moose River Plains Wild Forest was reclassified to create the new Intensive Use area along the road. There is considerable mention about the "loss" of roads in the Forest Preserve to Wilderness classification, but no talk about the "gain" of roads in Intensive Use areas.

What constitutes a material increase in road mileage?

Anything above 2-3%.

APA-DEC have calculated that the existing total roads mileage in Wild Forest areas of the Forest Preserve to be 206.6 miles. For the purpose of this public hearing, APA-DEC have proffered that a 15% increase in the total allowable mileage of roads in Wild Forest areas complies with the directive for "no material increase" in Wild Forest Basic Guideline No. 4. Protect the Adirondacks believes that 15% is much too high. We believe that 15% constitutes a "material" increase.

Consider that for many people in business who experience a 15% increase in their costs, that would be seen as substantial and "material." Anyone in business who sees a 15% increase in their profits will likely also see that as substantial and "material." Anyone who pays rent and experiences a 15% increase, where an $800 monthly rent payment is raised $120 to $920 will surely see that as substantial and "material." Staff at the APA or DEC who suddenly received a 15% pay cut would unarguably see that as substantial and "material." The US inflation rate in May 2022 was 8.6% and that's causing a political firestorm. This month the Federal Reserve raised its benchmark interest rates three-quarters of a percentage point and that was billed as the most substantial and aggressive hike since the 1990s. By any reasonable standard a 15% increase is material and substantial and violates Wild Forest Basic Guideline No. 4. A reasonable interpretation of the "no material increase" clause would be an increase in the low single digits of 2-3%.

What this means, on a practical level, is that the APA-DEC are already far over the legal limits for road mileage in Wild Forest areas, at a level around 20% to 25% or more, and are currently in violation of Wild Forest Basic Guideline No. 4. Hence forth, APA-DEC need to close roads to regain

compliance, and any new roads that are to be authorized in new acquisitions will require offsetting road closures in other units and locations. That's the reality.

Does the Department of Environmental Conservation Commissioner's Policy-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

Yes.

The APSLMP includes in its "road" definition roads that are "open to the public on a discretionary basis." It is absolutely clear that CP-3 roads are open to the public, though a permit is required, "on a discretionary basis." Members of the public who apply for a receive a CP-3 permit from the DEC are allowed to drive motor vehicles on roads deemed safe by the department for such use. As stated above if it looks like a road, is used by motor vehicles under any circumstance as a road, and is maintained like road, then it's a road.

Freedom of Information Request

Protect the Adirondacks submitted a Freedom of Information request for all materials that have been used by staff and the APA Board to undertake this analysis of formal interpretation of Wild Forest Basic Guideline No. 4. We were provided with the 2022 hearing materials posted on the APA website and a few irrelevant documents from the 1990s. The APA denied providi9ng us with other materials.

Former APA staff and former APA Board members informed us that there are important APA-DEC documents that were shared with APA Board members in the 1990s and early 2000s that shed light on this issue. Materials that are shared with Board members are by definition public documents and should be disclosed. Moreover, Protect the Adirondacks requests that all materials upon which APA-DEC staff are using to educate themselves, formulate policy, and make recommendations to the APA Board for its decision must be made public. That's basic good government openness and transparency.

Conclusion

Protect the Adirondacks does not agree with how the APA-DEC has proposed to interpret Wild Forest Basic Guideline No. 4. We urge the APA-DEC to adopt the following measures:

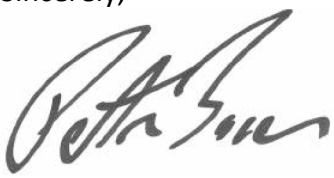
- Review Wild Forest Basic Guideline No. 4. in a wider context and explain how it is designed to work in concert with other parts of the APSLMP to cap road mileage in Wild Forest areas in the Forest Preserve.
- Adopt a much smaller, and more reasonable, interpretation of "no material increase" than the 15% level proposed.
- Include administrative roads and CP-3 roads in the total Wild Forest road mileage totals.
- Review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads in conservation easements in the Adirondack Park and the scores of miles of

motor vehicle roads in Primitive, Canoe, Historic, and Intensive Use areas in the Adirondack Forest Preserve.

- Acknowledge that APA-DEC have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and will be adopting measures to close roads in order to comply with the no material increase clause.
- Acknowledge the clear direction provided to the APA-DEC in the 2021 Court of Appeals decision where the Court wrote "The forever wild provision ensures the preservation of state-owned land within the Adirondack Park (and Catskills) in its wild state." They also wrote that the "ultimate objective of protecting the forest as wilderness" is the paramount purpose of Article 14. The Court also talked about APA-DEC's "fundamental misunderstanding" of the State Constitution when it tried to build a network of road-like Class II Community Connector Snowmobile Trails. Protect the Adirondacks is clearly concerned that the APA-DEC is making the same mistakes today. We urge moderation and restraint.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to submit these comments.

Sincerely,



Peter Bauer
Executive Director

SIERRA CLUB
ATLANTIC CHAPTER

July 12, 2022

Megan Phillips, Deputy Director for Planning
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Adirondack Park State Land Master Plan -- Wild Forest Basic Guideline No.4

Dear Megan Phillips,

Please accept these comments in response to the questions posed by the APA in the hearing on the APA-DEC interpretation of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4:

The US population is now more than 1.5 times what it was in 1972. Increasing population pressure is impacting practically every aspect of life. It is therefore all the more critical that the APA faithfully adhere to its core mandate, as stated in the Adirondack Park State Land Master Plan (APSLMP): "protection and preservation of the natural resources and state lands within the Park must be paramount."

In this time of increasing population pressure, development pressure, global warming, and wildlife habitat disruption due to climate change, it is critical that the Adirondack Park remains a refuge of undisturbed solitude for humans and wildlife.

In this context, the APA must strictly interpret the definition of roads in the State Land Master Plan, In Wild Forest areas, as meaning any route on which motorized vehicles can travel. This must include 'administrative roads', and CP-3 roads. These nominally different categories of roads must not be excluded from the total mileage count. Indeed, the definition in the APSLMP cannot be more clear: "Road – an improved way designed for travel by….motor vehicles…." No exceptions; the goal must be to avoid "impairing the wild forest atmosphere" (Guideline #1).

Regarding the Guideline #4 reference to "no material increase" in roads, the APA proposed definition of 15% is preposterous. By any measure, 15% ***is*** a "material increase." A "no material increase" figure would be in the range of 2% -3%.

Going forward in assessing questions of this type, the APA is obliged to now make these assessments in the context of New York's Climate Leadership and Community Protections Act, which requires New York to reduce greenhouse gas emissions 40 percent by 2030 and 85 percent by 2050 from 1990 levels. It would be highly irresponsible of the APA to consider expanding the Wild Forest road network, and the concomitant increase in motor vehicle use and CO2 emissions, in the face of this legislation and the dire consequences global warming.

Overuse and "carrying capacity" of the Forest Preserve are problematic issues facing the APA these days. Happily, the APSLMP provides the APA with clear guidance for addressing these concerns in Wild Forest areas: "no material increase in the mileage of roads…"

Sincerely,

Kate Bartholomew, Chair
Sierra Club Atlantic Chapter

Thomas E. Williams
38 Pleasant View Drive
Hudson, NY 12534
518-821-6406

7/11/22
Megan Phillips
Deputy Director of Planning
Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977
Re: Wild Forest Roads

Dear Ms. Phillips,

I write to you to offer my commentary on the issue of how the agency should interpret the allowable mileage for motorized roads in Wild Forest areas in the Adirondacks. As a lifelong sportsman, I have a great appreciation and respect for the wise use of our natural resources. Hunters, trappers, and anglers were and are, America's first and best conservationists. Our contributions have added untold value to wildlife management and habitat protection across the nation.

With that history of participation, I offer the following commentary and ask that it be given strong consideration in any final plan:

- an expansion of the 1972 limitations in a way that fairly balances the road mileage allowed with the sizeable increases in Wild Forest lands that have occurred in the last 50 years.
-that everything be done to expand CP-3 motorized access opportunities for those with disabilities, especially our veterans and their families.
-prior road closures in key areas like the Moose River Plains, should be re-considered, and ideally re-opened to their original and historical status.

New York State has an aging demographic, especially among those in the sporting community…I should know being 67 years old. Expanding reasonable access, considering the incredible increases in state owned and managed lands in the Adirondacks, just makes good sense.

Thank you for the opportunity to provide comments on this important discussion.

Best regards,

Thomas E. Williams

SLMP_UMP_Comments@apa.ny.gov

From: Keith McHugh <hidinginplainsight826@gmail.com>
Sent: Thursday, July 7, 2022 10:45 AM
To: SLMP_UMP_Comments@apa.ny.gov
Subject: "NO MATERIAL INCREASE OF ROAD MILEAGE ON WILD FOREST"
Attachments: warrencounty1895map.jpg; 1905 Adirondack Forest and Undated Day & Stony Creek Maps.pdf; Hutchens Deed.pdf; Letter_from_Day_Supervisor (1) (1) (1).pdf

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

Dear Megan Phillips,
For your report to have any sense of legitimacy, it must first address illegal roads that currently exist.
I present irrefutable evidence of an illegal mile long extension of Lens Lake Road within the Wilcox Lake Wild Forest.
Your report's map and APA published maps show Lens Lake Road passing across private property Lot 270.-1-2 (was #14) along the southern edge of Lens Lake, continuing through the Forest Preserve and ending at the Stony Creek town line.
The road actually, illegally continues .37 miles to the Livingston lake in-holding.

This road was illegally constructed in its present location after the 1901 purchase of this inaccessible in-holding by ancestors of the current owners. The current owners have close ties to APA and DEC officials who to this day work to conceal this illegality.

Attached are 1895 and 1905 maps showing the original route of Lens Lake Road passing to the southeast of private property Lot #14 (270.-1-2) and Livingston Lake Property in Day, NY.
Subsequent maps show the illegally "re-routed" Lens Lake Road. The illegal impoundment of the Paul Creek that created the Middle Flow and the doubling in size of Livingston Lake as a result of the new owner's damming it's outlet to the Paul Creek.

The Deed for Lot #14 now Lot 270.-1-2 with no reference to a road dividing it even though it changed title as recently as 1981.

DEC's Draft UMP does not list Lens Lake Road as a legal road
Adirondack Council's 2020 Vision Report issued in 1990 identified Livingston Lake and the private Lot 270.-1-2 as property conducive for state purchase as they were well aware of this illegality.

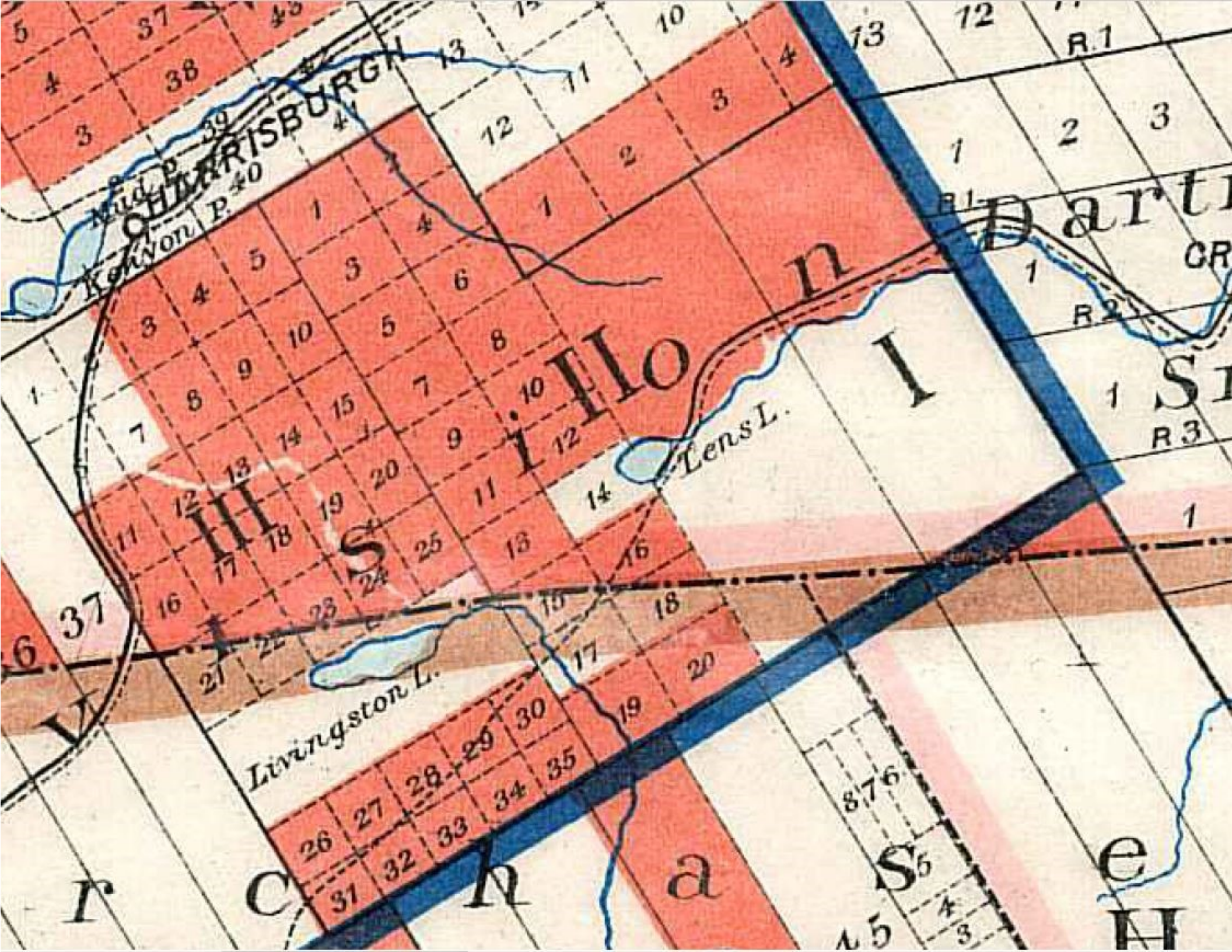
Good Luck with this impossible task that you are undertaking.

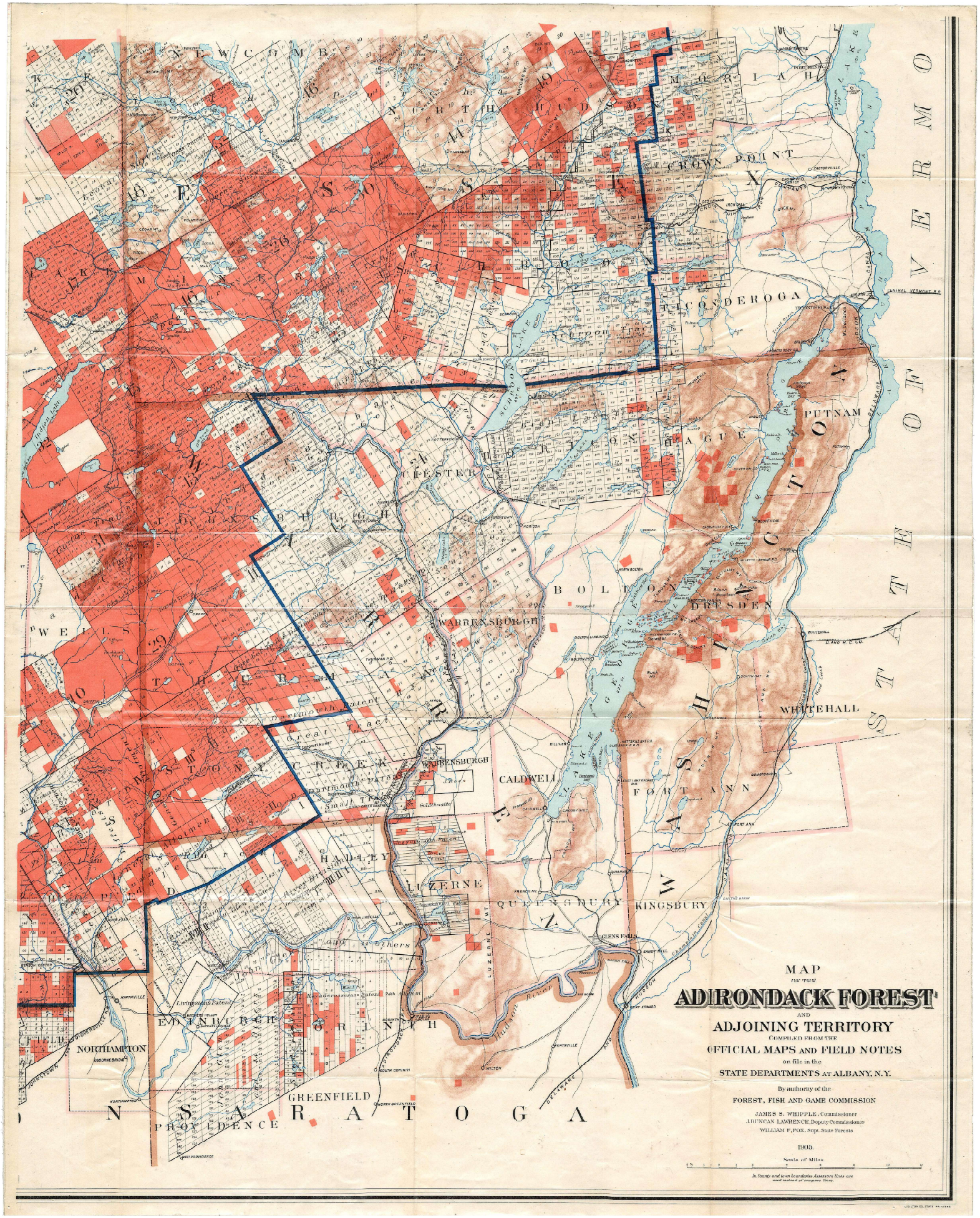
Keith McHugh

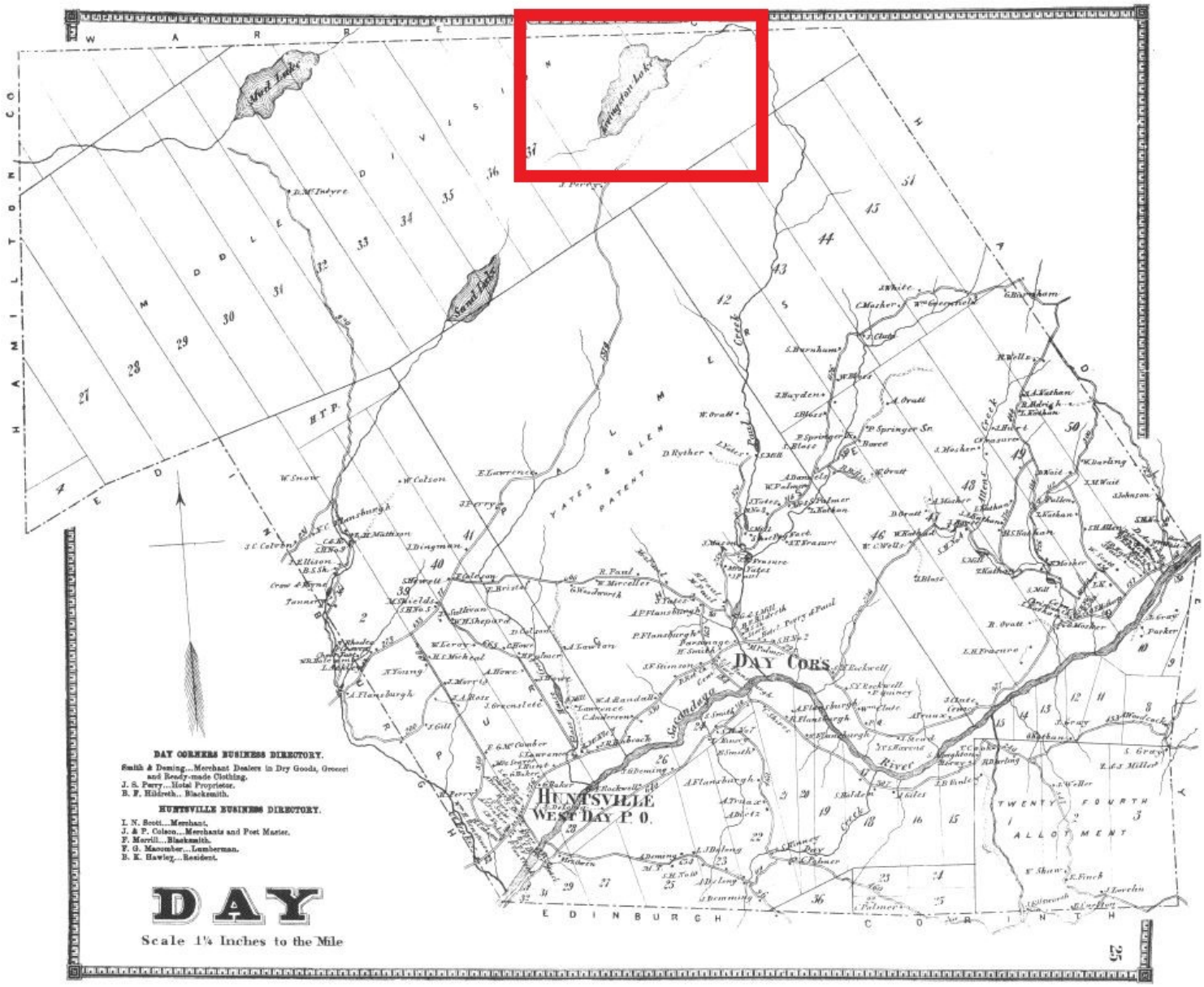
_1907 USGS.pdf

_Wilcox LWF road map.pdf

_ApludpSlmp20210625.pdf

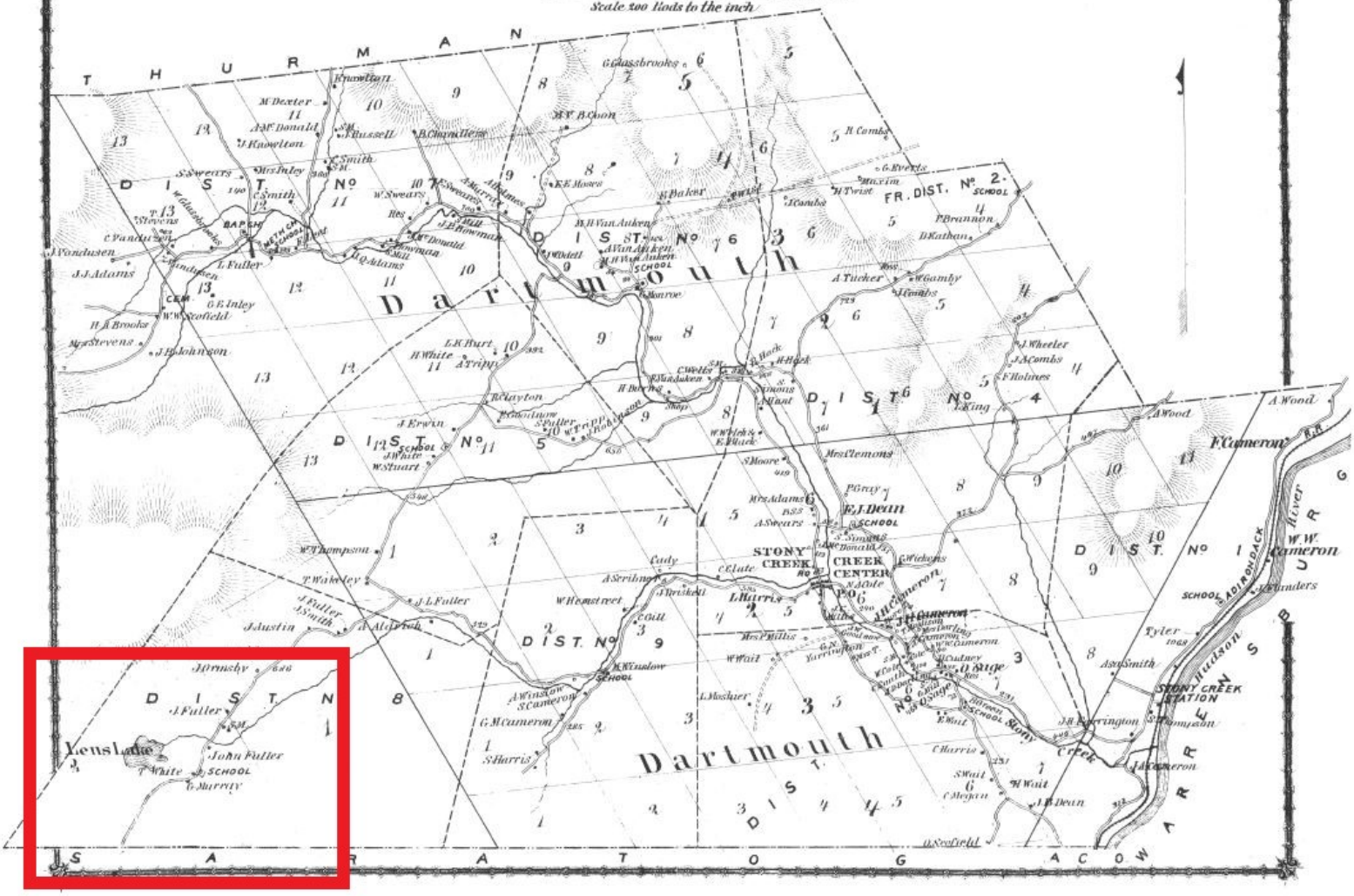

HARRISBURGH
Mud P. 39
Kenyon P. 40
Tens L.
Livingston L.
R.1
R.2
R.3
CR


MAP
OF THE
ADIRONDACK FOREST
AND
ADJOINING TERRITORY
COMPILED FROM THE
OFFICIAL MAPS AND FIELD NOTES
on file in the
STATE DEPARTMENTS AT ALBANY, N.Y.
By authority of the
FOREST, FISH AND GAME COMMISSION
JAMES S. WHIPPLE, Commissioner
J. DUNCAN LAWRENCE, Deputy Commissioner
WILLIAM F. FOX, Supt. State Forests
1903.
Scale of Miles
In County and town boundaries Assessors lines are used instead of company lines.
VERMONT
STATE OF
CROWN POINT
TICONDEROGA
PUTNAM
HAGUE
CHESTER
BOLTON
DRESDEN
WHITEHALL
WARRENSBURGH
CALDWELL
FORT ANN
HADLEY
LIZERNE
QUEENSBURY
KINGSBURY
GLENS FALLS
EDINBURGH
NORTHAMPTON
GREENFIELD
PROVIDENCE
SARATOGA
HUDSON RIVER
LAKE GEORGE
LAKE CHAMPLAIN
CENTRAL VERMONT R.R.
D. AND H. C. CO.


DAY CORNERS BUSINESS DIRECTORY.
Smith & Deming...Merchant Dealers in Dry Goods, Grocery and Ready-made Clothing.
J. S. Perry...Hotel Proprietor.
B. F. Hildreth...Blacksmith.
HUNTSVILLE BUSINESS DIRECTORY.
I. N. Scott...Merchant.
J. & P. Colson...Merchants and Post Master.
F. Merrill...Blacksmith.
F. G. Macomber...Lumberman.
B. K. Hawley...Resident.
DAY
Scale 1¼ Inches to the Mile
DAY CORS
HUNTSVILLE
WEST DAY P. O.
Mud Lake
Sand Lake
Livingston Lake
YATES & GLEN PATENT
TWENTY FOURTH ALLOTMENT
Sacandaga River
Paul Creek
Allens Creek
EDINBURGH
CORINTH
HAMILTON CO
WARREN CO
HAD
MIDDLE DIVISION
PALMER
PURCHASE
EDINBURGH
H.T.P.
25

PART OF STONY CREEK

Scale 200 Rods to the inch



3620

FORM 583½ N. Y. DEED—WARRANTY with Lien Covenant

TUTBLANX REGISTERED U. S. PAT. OFFICE
TUTTLE LAW PRINT, PUBLISHERS, RUTLAND, VT. 05701

LIBER 638 PAGE 657

This Indenture,

Made the EIGHTH *day of* APRIL, *Nineteen Hundred and* Eighty-One

Between

WALTER S. ARNOLD, of
255 North Forest Street, #211,
Bellingham, Washington, 98225,

party of the first part, and

WILLIAM D. HUTCHENS, of
417 Salt Springs Road,
Fayetteville, New York 13066,

party of the second part,

Witnesseth *that the party of the first part, in consideration of* ---------- One and 00/100 ---------- *Dollar* ($ 1.00) *lawful money of the United States,* and other good & valuable consideration *paid by the party of the second part, does hereby grant and release unto the party of the second part,* his heirs *and assigns forever, all*

THAT CERTAIN PLOT, PIECE OR PARCEL OF LAND, with the buildings and improvements thereon erected, situate, lying and being in the Town of Stony Creek, County of Warren and State of New York, being Lot No. 14 in the southwest part of Great Lot No. Two Middle Division, Palmers Purchase and bounded and described as follows, according to a survey map made by Joseph Fish dated May 20th, 1869, beginning at a small soft maple tree marked 11-12-13 and 14, thence north 62 degrees east 36 chains and 50 links to a small beech tree marked 12 and 14, thence south 30 degrees east 5 chains and 50 links to Lens Lake, thence 23 chains across the lake to a small hemlock tree marked 14 and 16, thence south 62 degrees west 36 chains and 75 links to a small hemlock tree marked 13-14-15 and 16, near a large rock in a swamp; thence north 29 degrees west 28 chains to the place of beginning, containing 103 acres more or less.

Being the same premises conveyed by Walter S. Arnold, as Administrator of the Estate of Flora Swan Arnold to Walter S. Arnold as sole distributee, dated December 1, 1972 and recorded December 11, 1972 in Book 561 of Deeds at page 250.

Together *with the appurtenances and all the estate and rights of the part* y *of the first part in and to said premises,*

To have and to hold *the premises herein granted unto the party of the second part,* his heirs *and assigns forever.*

And *said* party of the first part *covenants as follows:*

First, *That the party of the second part shall quietly enjoy the said premises;*

Second, *That said* party of the first part

will forever **Warrant** *the title to said premises.*

Third, *That, in Compliance with Sec. 13 of the Lien Law, the grantor will receive the consideration for this conveyance and will hold the right to receive such consideration as a trust fund to be applied first for the purpose of paying the cost of the improvement and will apply the same first to the payment of the cost of the improvement before using any part of the total of the same for any other purpose.*

In Witness Whereof, *the party of the first part has hereunto set* his *hand and seal the day and year first above written.*

In Presence of

Walter S. Arnold

RECEIVED
$ 27.50
REAL ...
APR 21 1981
TRANSFER ...
WARREN
COUNTY

2353

State of ~~New York~~ WASHINGTON
County of Whatcom } ss. *On this* 8th *day of* April *Nineteen Hundred and* Eighty-One *before me, the subscriber, personally appeared*
WALTER S. ARNOLD

to me personally known and known to me to be the same person described in and who executed the within Instrument, and he duly *acknowledged to me that he executed the same.*

William Marshall
Notary Public

RECORDED

APR 21 1 55 PM '81
... 638 Deeds
PAGE 657 AND EXAMINED
WARREN COUNTY, NEW
JOHN L. BOWMAN ...

Deed
WARRANTY WITH LIEN COVENANT

TO

Dated, 19

Please record and return to
John S. Ferguson
at
BOND, SCHOENECK & KING
ATTORNEYS AT LAW
ONE LINCOLN CENTER
SYRACUSE, N. Y. 13202

LIBER 638 PAGE 658

11

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Natural Resources, Region 5
232 Golf Course Road, Warrensburg, NY 12885
P: (518) 623-1203 | F: (518) 623-3603
www.dec.ny.gov

RECEIVED
JUN 14 2021
BY_____

May 28, 2021

Town of Day
1650 North Shore Road
Hadley, NY 12835
Attn: Supervisor Preston Allen

RE: Travelled Way through State Land, tax map parcel no. 1-1-1

Dear Supervisor Allen,

NYSDEC respectfully requests your reply in writing to the following questions regarding a section of travelled way in the Town of Day which runs through state land, tax map parcel no. 1-1-1. This section of travelled way begins at the Day / Stony Creek town line and passes southwesterly through state land to lands of the Livingston Lake Club, Inc. The enclosed map shows the travelled way in question.

1) Is this section of travelled way a town highway?
2) Does the town of Day receive CHIPS funding for this section of travelled way?
3) Does the town consider this section of travelled way discontinued as set forth in Sections 171 and 172 of NYS highway Law? If so, please provide the date of discontinuance.
4) Does the town consider this section of travelled way abandoned as set forth in Section 205(1) of NYS highway Law? If so, please provide the date of abandonment.
5) Does the town have a written agreement with the Town of Stony Creek to maintain this section of travelled way?

Relative to this section of travelled way, please provide copies of past written correspondence, town board meeting minutes and resolutions, as well as any maps that refer to its legality, abandonment, or discontinuance.

I look forward to your written response to these questions.

Robert J. Bradley

Sincerely,

Robert J. Bradley, NYSDEC Land Surveyor

Ec: Carolyn Wiggin, NYSDEC Real Property Supervisor
Kristofer Alberga, NYSDEC Supervisor of Natural Resources

TOWN OF DAY

Preston Allen, Supervisor
COUNTY OF SARATOGA
1650 NORTH SHORE ROAD, HADLEY, NY 12835
PHONE: (518) 696-3789 (EXT. 301) FAX: (518) 696-5391
E-MAIL: preston.allen518@gmail.com

Preston Allen
Supervisor
~ Ext 301~

Carol Vaillancourt
Town Clerk
~ Ext 302~

Ronnie Ladd
Highway
Superintendent
696-3019

Kenneth J. Metzler
Code Enforcement &
Zoning Enforcement
~Ext 300~

Peter Dziedic
Assessor
~ Ext 304~

Diana Edwards
Planning/Zoning
Board Secretary
~ Ext 305 ~

Carol Vaillancourt
Tax Collector
~ Ext 307~

Dave Davidson
Historian
~ Ext 308~

Justice K.O. Johnsen
~ Ext 306 ~

Dog Control Officer
Garrett Metzler
~Ext. 303~
Home 696-3617

Robert

1) No this is not a Town Highway
2) We do not receive Chips Funding for this
3) To my knowledge this has never been a Town Road
4) We have never maintained this Road
5) No we not have an agreement any work being done on this is not done by our highway dept. We do not recognize this as a town road.

I hope this answers your questions if you need anything further please feel free to reach out to me.

Supervisor Preston Allen

WARREN SARATOGA
AND
WASHINGTON COUNTIES
Scale: 1 inch = 2½ miles.
1 : 158,400.
MILES.
KILOMETRES.
NOTE.
The land lines are shown by full black lines of different strength, showing the Patents and their sub-divisions into Townships, Tracts and Lots. The names of the Patents and the numbers of the lots are in red.
Where County or Town lines are coincident with land lines, the former only are shown.
HORICON
HAGUE
TICONDEROGA
JOHNSBURG
CROSSFIELD PURCHASE
STONY CREEK
THURMAN
WARRENSBURG
CHESTER
WARRENSBURG
HARTFORD
KINGSBURY
WHITEHALL
POULTNEY
WEST HAVEN
CORINTH
MOREAU
WILTON
GREENFIELD
PROVIDENCE
NORTHUMBERLAND
GREENWICH
SARATOGA SPRINGS
SARATOGA
MILTON
GALWAY
CHARLTON
STILLWATER
WATERFORD
CLIFTON PARK
HALF MOON
WATERFORD
HOOSICK
PITTSTOWN
BENNINGTON
SHAFTSBURY
ARLINGTON
SANDGATE
ALBANY
WATERVLIET
COHOES
GREEN ISLAND
WEST TROY
TROY
LANSINGBURG
Addison Junction
Ticonderoga
Rogers Rock
Hague
Brant Lake
Horicon
Silver Bay
Dresden Station
Putnam Station
Benson Landing
Cold Spring
Taylor on Schroon
Adirondack
Northville
North River
Igerna
North Creek
Riparius
Wevertown
Johnsburg
Baker Mills
The Glen
Garnet
Thurman
Athol
Warrensburg
Knowlesville
Stony Creek
West Stony Creek
Chestertown
South Horicon
Bolton Landing
Sagamore
Bolton
Hill View
Cleverlale
Lake George Assembly
Kattskill Bay
Kennedy
Crosbyside
Lake George
Brayton
Comstock
North Granville
West Granville
Middle Granville
Granville
Slyboro
South Granville
Fort Ann
West Fort Ann
Hartford
South Hartford
East Hartford
North Hebron
Kingsbury
Smith Basin
Adamsville
Hampton
Poultney
Raceville
Edinburg
Batchellerville
Corinth
South Corinth
Palmer
Fortsville
Mount McGregor
Wilton
Gansevoort
Argyle
West Hebron
Cossayuna
Salem
East Greenwich
North Greenwich
Fort Miller
Thomson
Northampton
Greenfield Center
South Greenfield
Porter Corners
Northumberland
Bacon Hill
Battenville
Middle Falls
Greenwich
Schuylerville
Victory Mills
Saratoga Springs
Saratoga Lake
Coveville
Dean Corners
Quaker Springs
Ballston Spa
Malta
Round Lake
Stillwater
Mechanicville
Waterford
Cohoes
Troy
Melrose
Rensselaer
Lansingburg
Niskayuna
Schaghticoke
Valley Falls
Johnsonville
Buskirk
Tiashoke
Eagle Bridge
North Hoosick
Waloomsack
White Creek
Cambridge
Greenwich
Salem
Shushan
East Salem
Rupert
West Rupert
Pittstown
Melrose
Lansingburg
Cohoes
Green Island
West Troy
Troy
Albany
Watervliet
Hoosick
Bennington
Shaftsbury
Arlington
Sandgate
Copyright 1895, Julius Bien & Company N.Y.

From: Daniel M Habermehl
To: SLMP_UMP_Comments@apa.ny.gov
Subject: ADK road mileage. Public input
Date: Thursday, May 19, 2022 10:56:48 PM

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I think future land acquisitions should be considered separately conforming to the density of roads in forest land as outlined in the 1972 charter.

Motorized access for people with disabilities should not be included in the sum total and should be increased significantly beyond the present 21 miles.

Existing roads should be “value added” by adding more pull offs at scenic vistas and nearby areas of special interest.

Thank you for this opportunity to comment.

Dan Habermehl

Sent from my iPhone

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: supervisor@mylonglake.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Tuesday, July 12, 2022 12:06:44 PM

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********** 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 "WF-BG No.4, Clay J. Arsenault, supervisor@mylonglake.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Clay J. Arsenault
Email from: supervisor@mylonglake.com
Address: 1130 Deerland Rd. Long Lake NY 12847
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

I do not feel any of the proposed alternatives presented at the 2022 Annual Membership Meeting of the Adirondack Association of Towns and Villages can be ethically adopted without changing the State Land Master Plan through a transparent process to bring clarity to this issue.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: roberson_bill@yahoo.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Thursday, June 30, 2022 11:32:07 AM

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

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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 "WF-BG No.4, William Roberson, roberson_bill@yahoo.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: William Roberson
Email from: roberson_bill@yahoo.com
Address: 410 E. 17th St. Brooklyn NY 11226
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

A strict focus on Wild Forest Guideline No. 4 is improper and insufficient. Adirondack Wild feels the Agency is obligated to interpret the Master Plan comprehensively;

Motorized mileage and uses must both considered as relevant to judgements about “materiality” under the Master Plan;

Private lands under conservation easement allowing motorized uses must be factored into these judgments - as required by the Master Plan;

Motorized roads causing present damage to the Forest Preserve should be assessed and, under the Master Plan, restricted from motorized use by the public (making allowances in designated places for certified persons with disabilities);

Keep growth in motorized road miles and uses on Wild Forest Forest Preserve since 1972 under 15%.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: Jake.Mincemoyer@gmail.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Thursday, June 30, 2022 8:18:36 AM

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

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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 "WF-BG No.4, Robert Mincemoyer, Jake.Mincemoyer@gmail.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Robert Mincemoyer
Email from: Jake.Mincemoyer@gmail.com
Address:
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

Maintenance of the forever wild nature of the Adirondack Park is of utmost importance, especially given the great influx of additional visitors to the Park in recent years. While the Park must be available to all, this must be balanced with a weight on the scale in forever of forever wild to protect this incredible resource.
A strict focus on Wild Forest Guideline No. 4 is missing the point in the issue being discussed. The APA must view and implement the Master Plan comprehensively in considering
the specific question of motorized mileage and uses under the Master Plan.
The APA must also include its focus of review on the entire Park, as the Master Plan governs the entire Park - including private lands under conservation easement.
The APA should strongly review any motorized roads causing present damage to the Forest Preserve (especially in light of increased usage) and act boldly to restrict motorized use by the public where present damage is being caused.
Any growth in motorized road miles and uses on Wild Forest Forest Preserve since 1972 should be strictly considered and the “materiality” standard should be strictly construed in light of potential impact contrary to the forever wild requirements by which the Park is governed and the state, public and APA are bound. In my mind any increase of more than 5% should be considered material.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: edplowssnow@frontiernet.net
Subject: APA Project WF-BG No.4 Public Comments
Date: Friday, June 24, 2022 8:16:28 PM

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********** 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 RPComments@apa.ny.gov.
Please copy "WF-BG No.4, Edgar Brown, edplowssnow@frontiernet.net" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Edgar Brown
Email from: edplowssnow@frontiernet.net
Address: 1638 Cedar River RD Indian Lake NY 12842
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

I subscribe to the New York Outdoor News which is how I became aware of this review. My interest is focused on the Moose River Plains area. Frankly I'm quite puzzled by the map showing some roads are closed and some are open since the inception of the park in 1972. It would appear that the colors are mixed up as to what roads are open and what are closed. Roads in Red indicate being open for 1972 but closed for 2022, and roads in Yellow are open in 1972 and 2022...
The Limekiln Lake - Cedar River Rd. should be entirely in Yellow. And many of the spur roads should be in Red. I know for certain that the Otter Brook Road has been closed for some time. This also impacts access to the Indian Lake Rd., and the Indian River Rd.(also noted in the mileage download) There was never a "official" reason for closing this road other than a "management" decision. Even the local Forest Ranger had no explanation when asked. Getting to the point and back on subject, I strongly feel with the current trend of slowly closing spur roads that little by little the Plains will become nothing but a tourist drive through in the years to come if present management policies continue. Some of the "Spur" roads are so short they are nothing more than a parking lot. I.E. the Wakely Mt. Rd is nothing more than a place to get off the road and room for a sign in board. My point is if we use these spur roads for a total of miles then the public will be shortchanged and access to areas will be limited only to those who can hike there.
Therefore I do not support including CP-3 roads/trails to the mileage total. Since the trails/roads that are set aside for this purpose alone are closed to the general public It doesn't make sense to include them in the mileage totals for any of the roads within the Park.

Sincerely Ed

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: kathryn@kecarroll.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Friday, June 24, 2022 2:12:14 PM

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Please copy "WF-BG No.4, Kathryn Carroll, kathryn@kecarroll.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Kathryn Carroll
Email from: kathryn@kecarroll.com
Address: NY 12203
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

I am a disabled person, a lawyer, staffmember at the Association on Aging in New York, and a Councilmember of the New York State Independent Living Council. I am also a member of the Accessibility Advisory Committee to the APA and DEC established as part of a consent decree agreed to following the Galusha v. NYSDEC lawsuit. I also serve on the Forest Preserve Advisory Council (FPAC) in relation to that role.

As with nearly all administrative decisions, the decisions the APA Board makes regarding the management, use, and preservation of our Wild Forests will impact disabled people. In this case, the impact comes in the form of where and how disabled people might have access to roads that allow us to reach desirable destinations within the “Blue Line” we might not otherwise be able to access.

The APA has completed tremendous work already to address what it needs to address as part of the Adirondack Park State Land Master Plan which drives our activities to ensure sustainable access. But this work was done without input by the Accessibility Advisory Committee. This being the case, I believe due diligence demands the Board take a step back and formulate proposals to address the “no material increase” goal with the input of disabled people.

The options put forward by the board on whether or not to include Galusha and non-Galusha CP-3 road miles at all as part of the overall road mileage count make assumptions about access we cannot afford to perpetuate for the sake of disabled New Yorkers, a population increasing in number all the time.

The proposals assume that the CP-3 is what we should be relying on to ensure access to hard to reach points. CP-3 is flawed. CP-3 puts requirements on individuals to obtain permits, but then remains inaccessible to people with certain disabilities because of the logistical and physical barriers to getting “beyond the gate.” The CP-3 narrowly focuses on access via motor vehicles and ATVs, which, granted, might have a greater impact than other modes of transportation, such as pedestrianism on accessible trails, or use of power-driven mobility devices. And, CP-3 is a stand-in for reasonable accommodation for individual disabled people. This is not the spirit of letter of the ADA. We should be thinking about a framework that enhances accessibility to all points, and not on a menu of places where the DEC has already determined access is possible (again, relying on motor vehicles and ATVs).

Two of the options put forward are asking for a choice between more miles for all and a few more miles for disabled people to reach places we otherwise couldn't. A cap on what can be made more accessible via a road is also counter to the purpose of the ADA. A ceiling on access is not acceptable. The third option, not including CP-3 miles at all, on its face permits the greatest flexibility for access, but implicitly relies on CP-3 as a means, and as I just outlined, C-3 is flawed.

Therefore, if the Board is seriously considering any of the options , including excluding CP3 miles altogether, I ask that the Board also propose a plan, with a timeline, to address how equal access will be achieved, if not by "roads," then by what means.

To summarize, I am requesting the Board take its time before any decision to solicit input directly from the Committee and those directly impacted, and to ultimately put forward a plan that proactively addresses expanding access so disabled people are not left behind.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: Jolix2@me.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Thursday, June 23, 2022 10:12:31 AM

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Please copy "WF-BG No.4, Joli Myatt, Jolix2@me.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Joli Myatt
Email from: Jolix2@me.com
Address: 227 Fiske Road West Chazy NY 12992
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

In past years the APA regulated road mileage on Wild Forest Roads. The Wild Forest mileage cap has not increased even though private land in 1972 is now owned by the state.
I feel the DEC/APA should decide what roads to open by using the Unit Management Process.
Many acres of land have been purchased by the state over the past 50 years with very little roads opened to the public. I would think if the amount of state land has increased the cap on the Wild Forest mileage should increase also.
In the Galusha access the road miles have counted as part of Wild Forest but the Galusha access is not open to the public and the CP3 routes are only open to the disabled so these road miles should not be counted. I don't see how the APA can consider these miles open to the public. These miles are NOT OPEN TO THE PUBLIC.
Furthermore the DEC should not be changing these routes with out the Federal Courts permission.
Myself and our ATV club feel our core values are respect for the beauty of the land. As we get older the only way we can enjoy the beauty of the back country is on ATVs. I have seen some beautiful places over the years that I would have missed out on if not for the ATV access.
Our club takes great pride in maintaining our trails, leaving them as natural as possible yet keeping them safe to travel on.
The D&H Rail Road has deeded the land in the Lyon Mountain/Standish area to be used as public access so people could enjoy the beauty of this land and the DEC has taken it away.
Soon people will not be able to see true beauty of our precious state.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: rstaples@rochester.rr.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Thursday, June 23, 2022 7:20:59 AM

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Please copy "WF-BG No.4, Richard Staples, rstaples@rochester.rr.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Richard Staples
Email from: rstaples@rochester.rr.com
Address: 26 East Main Street Shortsville New York 14548
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

These comments relate directly to the "Moose River Plains". Thank you for providing a forum to allow comments, however, it seems the out come by the APA has been predetermined? My family has enjoyed four generations of camping, fishing and hiking in the Moose River Plains, how did we do this, with access by automobile! I absolutely reject any effort to close down any of the roads in the MRP. I find it quite interesting that over four million visitors visit Yellow Stone every year by auto, but yet in New York when we have public lands the Tyrannical Bureaucracy in New York limits our access? Several years ago access to Squaw Lake and Indian Lake were closed, APA would argue, no you can hike, really, try walking those distances when your in your 70's and 80's. If you want people to support conservation there is no better way than to allow them to see the beauty of these areas, not restrict access, its counter productive. Thank You

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: James.Sullivan571@gmail.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Saturday, June 11, 2022 9:58:22 PM

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Please copy "WF-BG No.4, James Sullivan, James.Sullivan571@gmail.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: James Sullivan
Email from: James.Sullivan571@gmail.com
Address: PO BOX 632 Walden NY 12586
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

I would like to make public comment regards to APA Project ID: WF-BG No.4. I am the steward for Hudson River Recreation Area in Lake Luzerne in the Lake George Wild Forest. The bear slides trail from parking lot (Town line) should remain accessible to people with disabilities and there should be more roads in Hudson River Recreation Area for people with disabilities.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: millerking@gmail.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Sunday, June 5, 2022 7:11:56 PM

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Please copy "WF-BG No.4, Todd Miller, millerking@gmail.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Todd Miller
Email from: millerking@gmail.com
Address: 1331 County Route 60 Vermontville NY 12989
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

Does the APA consider measuring MILEAGE to be a proxy for indicating USE?

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: millerking@gmail.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Sunday, June 5, 2022 7:02:58 PM

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Please copy "WF-BG No.4, Todd Miller, millerking@gmail.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Todd Miller
Email from: millerking@gmail.com
Address: 1331 County Route 60 Vermontville NY 12989
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

Wild Forest Basic Guideline No. 4 states "Public USE of motor vehicles will not be encouraged AND there will not be any material increase in the mileage of roads and snowmobile trails". The conjunction "AND" here indicates that both USE and MILEAGE are to be addressed. However, this project only addresses MILEAGE. Capping mileage doesn't necessarily discourage use. Even when the mileage has been held constant during the last 50 yrs, USE has significantly increased on the public roads in Wild Forests over the last 50 yrs. Why isn't "USE" being addressed? Why is "USE" not being measured? USE is clearly the more relevant parameter in order to manage roads in Wild Forests rather than mileage. Does the APA consider controlling MILEAGE to be a proxy to be controlling USE? If yes, I would suggest that MILEAGE is a poor proxy in this case because USE can vary greatly, whereas, MILEAGE may not. I would suggest the agency design a project the quantify USE.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: commander171@aol.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Tuesday, July 12, 2022 9:56:55 AM

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Please copy "WF-BG No.4, Robert Fish, commander171@aol.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Robert Fish
Email from: commander171@aol.com
Address: 13 Park Row Cadyville NY 12918
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

The mileage allowance in 1972 did not allow for the continued expansion of the Adirondack Park State property. This has caused a lot of confusion to users of the roads and trails within the park. There is a need to expand the present allowable mileage by a least 15%. This would allow some contested trails or roads to at least be opened to motorized travel, be it by ATV UTV, or snowmobile. Elderly and disabled folks like myself, have a hard time to go areas without the use of some type of vehicle. Thank You.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: 67mustangway@gmail.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Monday, July 11, 2022 7:59:34 PM

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Please copy "WF-BG No.4, Dennis Del Grosso, 67mustangway@gmail.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Dennis Del Grosso
Email from: 67mustangway@gmail.com
Address:
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

This short segment of trail is critical to connection between Clinton and Franklin Co. It is only 1.1 miles long, AND .6 of that is already authorized for vehicles to Hunter Home and Little Camps. Further, the SAME trail is already an OPRHP authorized sled trail and serves that community quite well. Finally, prior to the State acquiring this land, previous deeds explicitly noted that it was deeded to the people of Lyon Mt as recreational, all the way back to when Republic Steel first sold the land. That stipulation was removed upon transfer to the State of NY. It has historically been used by the recreational community WITHOUT issue to the environment - it should continue to be available to this community!

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: Drowne29@gmail.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Monday, July 11, 2022 7:56:51 PM

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Please copy "WF-BG No.4, Daniel Drowne, Drowne29@gmail.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Daniel Drowne
Email from: Drowne29@gmail.com
Address:
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

To whom it may concern
APA has been regulated wild forest roads mileage cap, and has not increased it from the beginning of 1970s. Even with private lands back then being owned by the Stare now. I believe that DEC and APA should work together and decide what roads should be used by the Unit Management system.
By the state purchases of land over the past 50 years with hardly any roads opened to the public. I feel that the purchase of said lands should also have a increase in the amount of land cap also.
I would also like to note the Galusha road miles are counted as open as Wild Forest but has no public access, and only opened to people with disabilities. This road miles should'nt counted as they aren't open to the regular public.
Our ATV club would like to see these issues especially as more of us get older get resolved and let us also enjoy the beauty of the great state-of New York.

Daniel Drowne

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: larry_myatt@yahoo.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Monday, July 11, 2022 2:10:17 PM

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Please copy "WF-BG No.4, Lawrence j Myatt, larry_myatt@yahoo.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Lawrence j Myatt
Email from: larry_myatt@yahoo.com
Address: 227 Fiske rd West Chazy NY 12992
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

To whom it may concern
APA has been regulated wild forest roads mileage cap, and has not increased it from the beginning of 1970s. Even with private lands back then being owned by the Stare now. I believe that DEC and APA should work together and decide what roads should be used by the Unit Management system.
By the state purchases of land over the past 50 years with hardly any roads opened to the public. I feel that the purchase of said lands should also have a increase in the amount of land cap also.
I would also like to note the Galusha road miles are counted as open as Wild Forest but has no public access, and only opened to people with disabilities. This road miles should counted as they aren't open to the regular public.
Our ATV club would like to see these issues especially as more of us get older get resolved and let us also enjoy the beauty of the great state-of New York.

Sincerely
Lawrence J Myatt

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: ej05411@yahoo.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Saturday, July 9, 2022 9:29:12 PM

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Please copy "WF-BG No.4, Scott Miller, ej05411@yahoo.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Scott Miller
Email from: ej05411@yahoo.com
Address:
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

I support the second option for road classification. I don't believe the CP-3 roads should be included, mainly due to the fact they are not being used on a regular basis. I also believe future land acquisitions should have some road access if roads are on the parcel. There should be a balance for access for all users of the forest preserve.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: safleming48@yahoo.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Friday, July 8, 2022 8:08:23 PM

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Please copy "WF-BG No.4, Sheryl Fleming, safleming48@yahoo.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Sheryl Fleming
Email from: safleming48@yahoo.com
Address: Hoffmeister New York 13353
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

I am a resident of the Adirondack Park. This issue was brought to the attention of the residents who attended our town board meeting. My husband and I are seniors and enjoy walking…not hiking…to see the beautiful areas/lakes. We need public access on roads via our vehicle in order to reach the awesome walking trails in general. The Forest Preserve should not discriminate against us seniors, people with disabilities and children.
I don't understand why this change needs to happen. My husband and I bought our camp 30 years ago and have enjoyed access via vehicle to the walking trails. We moved to the Adirondacks permanently 10 years ago. I will be very disappointed if this change to access takes place.

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: skidog17@msn.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Saturday, July 2, 2022 12:15:32 PM

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Please copy "WF-BG No.4, Gregory Wait, skidog17@msn.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Gregory Wait
Email from: skidog17@msn.com
Address: 475 county rt. 10 NY 12822
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

Hello,
There is a reason why we are even considering this road interpretation issue and why it was originally established into law. The reason is simple. Bob Marshall and many others devoted their lives to securing what we value about the park today.
Without his wisdom and devotion, the park would have an entirely different character:
Many dams and Lake George villages, and housing developments. Historically, and now, the pressure to degrade the natural character of the park has been incessant.
I think very strongly that your responsibility here is great. Please consider the wisdom of Mr. Marshalls words in your interpretation.
" Definitely there have not been enough large roadless tracts safely reserved from invasions. There is important need to make study at an early date concerning which officially designated roadless areas should be enlarged and which official actions has not been taken should be established".
" It is unfortunately true that there are relatively few areas of more than fifty square miles that can still be set aside in the Adirondacks. These seem so precious from the standpoint of primitive forest recreation that they should be safeguarded in the future by all means".
" The wilderness, uninvaded by any signs of mechanization, has a value unique to outdoor recreation. It has value which to countless individuals exceeds any other value there is.....an automobile road...wrecks the sense of wilderness completely..... will destroy the character of the Adirondacks as " wild forest lands" a priceless character which the New York state Constitution for 41 years has tried to preserve".
Please continue the path laid out for you. Please do not increase roads into the forest preserve.
Thank you, Gregory Wait

From: noreply-pc@apa.ny.gov
To: SLMP_UMP_Comments@apa.ny.gov
Cc: gordonduprey72@msn.com
Subject: APA Project WF-BG No.4 Public Comments
Date: Tuesday, July 12, 2022 3:29:00 PM

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Please copy "WF-BG No.4, Gordon Duprey, gordonduprey72@msn.com" into your message for our reference.

****

Attn: Megan Phillips
Comments from: Gordon Duprey
Email from: gordonduprey72@msn.com
Address: 24 Reservoir Rd NY 12972
Re: Agency Project WF-BG No.4, Adirondack Park SLMP -

My Comments:

Please use some of those extra miles to the .6 mile at Chazy Highlands, that comes out on the Wolf Pond Rd, in the hamlet of Standish, NY. The trail was closed off due to the resurveying a number of years back. This had been an open trail, until that point. Now it's closed off.

Thank You,

Gordon Duprey

From: Violet Martin
To: SLMP_UMP_Comments@apa.ny.gov
Subject: APA roads
Date: Wednesday, May 18, 2022 8:01:26 PM

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

Please don't shut roads down. These roads through the wilderness gives kids and adults who physically can not hike the opportunity to enjoy remote wilderness. These roads also allow access to some incredible remote wilderness hiking/camping opportunities for those are that physically able to hike. It'd be a shame to lose any access.
Violet Martin

Sent from my iPhone

From: Jamie Pellegrin
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Adks road access
Date: Wednesday, May 18, 2022 1:51:04 PM

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

I recently saw a post about public comment towards adding more roads in the moose river plains and other wilderness.
I personally enjoy getting off the beaten path. Away from all the vehicle traffic. I feel that the moose doesn't need anymore roads or atv use. I come to the daks for tranquility. Away from civilization.

Sent from the all new AOL app for Android

From: Hi There
To: SLMP_UMP_Comments@apa.ny.gov; Rice, Barbara (APA)
Subject: Comments on No Material Increase of Roads in Wild Forest
Date: Wednesday, July 13, 2022 10:43:26 AM

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

I am writing in response to the request for public comments regarding the "road materiality" issue that came before the Agency at the May 2022 monthly meeting. I appologize that these comments come a day light, however because of the importance of this issue, I hope that you will consider these commenst and take them into consideration as you move forward. My comments, below address, in part your questions posed in the May 17th Agency press release, however due to the nature of the data supplied to the Agency will address issues of Adirondack Park State Land Master Plan (APSLMP) interpretation as well.

1. What is a road for the purposes of the APSLMP?

A road is clearly defined in the APSLMP. The APSLMP considers a road "an improved or partially improved way designed for travel by automobiles and which may also be used by other types of motor vehicles except snowmobiles, unless the way is a designated snowmobile trail …" (APSLMP 2019 at p. 20). The definition continues by describing three criteria, any of which must be met to consider a road a "road" under the APSLMP:

> *(i) either maintained by a state agency or a local government and open to the general public;*
>
> *(ii) maintained by private persons or corporations primarily for private use but which may also be open to the general public for all or a segment thereof; or,*
>
> *(iii) maintained by the Department of Environmental Conservation or other state agency and open to the public on a discretionary basis.*

It is clear from the above definition, that "roads" encompass more than just roads managed by DEC. It also includes roads that are maintained by any public entity (state, county, town and village highways and streets) as well as private rights-of-way across state lands for use by private parties to access adjoining lands.

2. For the assessment that was presented to the agency to be accurate, all roads must be reviewed.

While it is clear that the APSLMP definition considers virtually anything that was designed for use by motor vehicle a "road," the assessment provided to the Agency by staff only considered a fraction of those roads.

For instance, the mileage tallies and accompanying maps are limited to only a fraction of roads:

> *The following are the criteria used for including road segments in the maps and tables:*
>
> - *Includes road segments only under DEC jurisdiction. Town, county, and state highways were not included, even if they cross wild forest lands.*
> - *Does not include private rights-of-way or DEC administrative roads.*

• Does not include roads that form the boundary between wild forest and private land.

• Includes roads that form the boundary between wild forest and more restrictive state land classifications.

• If land was classified wild forest since 1972 (due to acquisitions or reclassification), public road mileage on those lands was counted as "new," even if those roads physically existed prior to wild forest classification.

• Includes roads based on administrative status, and in limited instances does not reflect the physical status of the road segments. For, example, includes roads that are physically closed due to maintenance constraints, but could be reopened at any time without further administrative action.

• Does not include access routes to public parking areas if less than 0.1 miles.

• Includes roads on State Forests and Wildlife Management Areas within the Adirondack Park in Clinton County. Although these lands are not Forest Preserve, they are still classified as wild forest in the SLMP, and therefore subject to wild forest basic guideline No. 4.

Because the analysis includes only a portion of the roads covered by the APSLMP definition the analysis is incomplete and the conclusions and scenarios provided to the Agency are fatally flawed and incomplete. Specifically, most public highways need to be included, because the vast majority of roads in the Adirondacks are "roads by use" – they exist as a prescriptive right across lands of another, in this case, the State of New York. Virtually all public roads go through or adjoin state lands are on lands classified under the APSLMP by the APA.

A defense by the State that the State lack s the jurisdiction to close these roads is similarly fatal in that the Commissioner of Environmental Conservation specifically has the right to close roads on state lands under section 212 of the Highway Law. This ability was upheld by the courts in Kelly v. Jorling, 164 A.D.2d 181 in the case of the Crane Pond Road in the Town of Schroon, Essex County.

It is clear that all roads on state lands regardless of ownership are considered "roads" under the APSLMP. Therefore the criteria that should be used for the analysis of "no materiality" is whether the roads are "roads and snowmobile trails open to motorized use by the public in wild forest areas." APSLMP 2019 at 35. To be clear this, by definition, would include both private roads as well as state/county/town/village roads that are open to the public.

3. The tally is further flawed because it does not comply with its own criteria.

Notwithstanding the above, the roads tallied do not comply with staff's own arbitrary criteria for inclusion. Examples can be found in most maps provided. I include a few for consideration:

1. Debar Mt Wild Forest – a section of the Four Mile Road and the entirety of Pinacle and Vanderwalker Roads that form a boundary between private lands and Wild Forest
2. Independence River Wild Forest Map 1 – Francis Rd is shown on private land and listed as open in wild forest in 1972, but not in 2022. How could this happen

unless there was a constitutional amendment that transferred the lands to private ownership (there isn't)

3. Saranac Lakes Wild Forest – Floodwood Mountain Road – a boundary road between state and private lands

4. Criteria appears to be inconsistent in some instances

It is unclear why roads that form the boundary between public and private lands are not counted, yet roads that form the boundary between Wild Forest and another state land classification are counted. No Material Increase is limited to wild forest lands, not other classifications. These situations should be treated consistently from an evaluation standpoint, and as I described in #1, above, they ALL should be counted. Examples include:

- Aldrich Pond Wild Forest – Jackworks Trail
- Blue Mt. Wild Forest – portions of Chain Lakes Rd South
- Moose River Plains Wild Forest – Sagamore and Sagamore Spur Roads

5. Roads that are private rights-of-way should not be considered under no materiality

The justification provided for this criteria is that somehow the impacts of private use and public use are bifurcated. This is questionable for numerous reasons. In many cases the private use is more than the public use. Instances of this include the ROWs cross sections of the Debar Mt and Cranberry Lakes Wild Forest to provide access to adjacent private lands as well as the Sagamore and sagamore Spur Roads – other examples exist as well.

The private impacts, including in some cases commercial truck traffic, to wild forest character will remain whether the DEC opens the road to public use. In addition, the ECL Article 15 (protections of waters) law and accompanying regulations statutorily exclude waters on state lands. For this reason the protections afforded our precious waterways under Article 15 do not exist on the Forest Preserve. Rehabilitation and maintenance are not regulated, with the possibility of negative impacts to water quality. If the state were to open these same roads to public use, it would have a mandate to maintain those roads to Article 15 standards – stream crossings would be protected to a higher degree and situations such as perched culverts that preclude free passage of fish would be reduced. In this example it would actually be better public policy, both from an access as well as natural resource protection standpoint if the State had a role in maintaining those roads.

6. APA needs to revisit this exercise to be consistent with the APSLMP or consider a modification to the APSLMP to address these issues.

It is clear that staff working for the Agency feel that no materiality should only apply to a subset of roads on the forest preserve, specifically the roads that open to the public are under only DEC's management jurisdiction. This clearly does not meet the intent of the letter of the APSLMP, no the intent of the drafters, as described in numerous historical sources.

It is also clear that DEC lead a land acquisition program form the late 1970's through the early 2000's that was well beyond what the drafters of the original APSLMP envisioned. The addition of 50,000

acres of conservation easement that is intersperses with Forest Preserve is a significant change with respect to roads and access in its own right. This success has in no small part created the situation that the State is currently trying to address. In addition, public expectation has changed in the last 50 years, public policy regarding equality and access has changed both at the state and federal level (ADA being the notable example).

Given the fundamental change in land ownership in the last 50 years as well as significant changes to public policy, an open discussion about access and motor vehicles is needed. The APSLMP specifically provides for this review – The APA Act requires this as does the APSLMP itself:

> *Planning is an on-going process and**, as public use of the state lands expands or changes in years ahead, land use controls may require re-analysis**. The Agency will undertake annual reviews** of the master plan to address such issues as the classification of recent acquisitions, reclassification resulting from the removal of non-conforming uses, modest boundary adjustments, minor technical changes, **clarification or corrections and similar matters**.* (APSLMP 2019 at 9, emphasis added)

The questions on the table in light of numerous changes over the past 50 years clearly rise to the level where a formal review of this section of the plan is needed. The limited interpretations provided to the Agency for consideration, are arbitrarily narrow and warrant a more fundamental review ow whether the language in a planning document in 1972 are still relevant in 2022.

For the Agency to arbitrarily ignore two of the three classes of "roads" would be an overreach of its ability to reasonably interpret the APSLMP and likely leave the Agency exposed to an Article 78 suit. It appears that this exercise if one of the APA not being able to see the forest for the trees.

From: Philip Vander Molen
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Keep Roads Open
Date: Wednesday, May 18, 2022 2:52:10 PM

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NY is already one of the most limited rural vehicle access places in the country. There are not legal class 4 historic roads as there is in Vermont.

As a land owner in Dewitt and Inlet, in the Park, I value the already minimal access to areas like the Moose River Plains and the few other access roads to explore and tour.

I am not a snow mobile rider so don't have easy access to the inner places in the park.

Closing roads would restrict even more access to an aging but very high tax paying population.

Keep the roads open and even consider making more available Jeep style trails.

Thank you.

Philip Vander Molen
224 Wellington Road
Dewitt, NY 13214
315-952-7787

From: Alexander Lombard
To: SLMP_UMP_Comments@apa.ny.gov
Date: Wednesday, May 18, 2022 12:06:10 PM

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

Please consider keeping existing roads open! Take a look at Maine, Vermont, and especially Colorado on how these wild areas are managed for roads. It is 100% possible to have wild lands that include roads.

From: Beth Maher
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Mileage of roads on the Forest Preserve
Date: Monday, July 11, 2022 10:47:01 PM

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It seems pretty easy to interpret the original intent: "There will not be any material increase in the mileage of roads...in the wild forest areas." Keep the wild forest areas WILD!

Thank you,

Beth Maher
132 Old Farm Rd Box 199
North River, NY 12856

From: Sylvia Vidal
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Monday, July 11, 2022 6:02:32 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

Any interpretation of the SLMP's stipulation "there will not be any material increase in mileage of roads" must incorporate the SLMP's broader limitation of motorized use and preservation of the essentially wild character of Wild Forest lands. I do not believe that the proposed guidelines should be promulgated without a broader scope that defines and addresses other factors that affect not just the length, but the volume and impact of all motorized activity in Wild Forest areas.

I therefore make the following arguments in support of my position:

1) The ceiling of "no material increase" is not just about mileage, but all motorized uses and their effects upon the Wild Forest character. The APA's focus is better served by considering a reasonable interpretation of the meaning of "Wild Forest character" and using metrics that better measure it. In several places the SLMP speaks directly to the issue of appropriate locations for motorized use, with preference to travel corridors and borders of Wilderness and Wild Forest areas, avoiding motorized access to the heart of larger areas and thus preserving remoteness. This suggests that defining a metric to the evaluate remoteness would be as good a means—if not superior—to gauge the health of the Forest Preserve than the length of roads and snowmobile trails.

2) The APA's question #2 concerns the interpretation of the term "no material increase," and whether this guideline should be converted to a definable metric greater than, less than, or equal to 15%. These are all distressing possibilities to consider, because there is no statistically valid interpretation by which 15% would not be considered a material numeric increase. For instance, I would be ecstatic if my employer offered me a very significant 15% raise, and no doubt so would you. Any proposal that attempts to link the concept of "not material" to a 15% benchmark in any manner should be shelved as an unworkable concept that violates both the letter and spirit of the SLMP.

3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Sylvia Vidal
115 round pond brook loop
Indian Lake , NY 12842

From: Lorenz Steininger
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 7:17:23 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Lorenz Steininger

stafford, VA 22554

From: Ann Lynch
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 7:09:45 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Ann Lynch

Plattsburgh , NY 12901

From: Karen Warriner
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 6:35:21 AM

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Dear Ms. Phillips,

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In addition to the above argument, what about animals? We (as humans) are squeezing them more and more out of their natural habitats causing them to hunt for food in residential (non-forest) areas, which in turn labels them a nuisance and sometimes they are killed for it. These roads will continue to do that even more and it’s appalling knowing that you don’t care about that balance between nature and human destruction, I mean humans. “No material increase” is a bullsh$t line. It most definitely is … maybe not in the way you’re intending it for the purpose of this letter , but there most certainly is. Material in this case is their food, the garbage people will leave behind that will kill them, the foliage that will be destroyed from the vehicles and people jumping off in the woods for a “pee break”, the cigarette butts that may start a fire… When i hike, there are signs EVERYWHERE…”re-vegetation area”…” or “please stay on the trail…” and summit stewards asking you to walk on the rocks to not kill the plant life up there. Just last weekend I saw a bird eating the little flowers. If you allow more “non-material” roads through this delicate and so-important land, you are disrupting what little balance we have left causing major shifts in the ecological make up of the park.

In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Karen Warriner
Karen Warriner
17 Meadow St
Massena, NY 13662

From: Kerry Rose
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 12:27:26 AM

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Dear Ms. Phillips,

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Kerry Rose

Middletown , NY 10941

From: Kevin Proescholdt
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 10:57:08 PM

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Dear Ms. Phillips,

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Kevin Proescholdt
2833 43rd Ave S
Minneapolis, MN 55406

From: Allie Delventhal
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 9:34:59 PM

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

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Any interpretation of the SLMP's stipulation "there will not be any material increase in mileage of roads" must incorporate the SLMP's broader limitation of motorized use and preservation of the essentially wild character of Wild Forest lands. I do not believe that the proposed guidelines should be promulgated without a broader scope that defines and addresses other factors that affect not just the length, but the volume and impact of all motorized activity in Wild Forest areas.

I therefore make the following arguments in support of my position:

1) The ceiling of "no material increase" is not just about mileage, but all motorized uses and their effects upon the Wild Forest character. The APA's focus is better served by considering a reasonable interpretation of the meaning of "Wild Forest character" and using metrics that better measure it. In several places the SLMP speaks directly to the issue of appropriate locations for motorized use, with preference to travel corridors and borders of Wilderness and Wild Forest areas, avoiding motorized access to the heart of larger areas and thus preserving remoteness. This suggests that defining a metric to the evaluate remoteness would be as good a means—if not superior—to gauge the health of the Forest Preserve than the length of roads and snowmobile trails.

2) The APA's question #2 concerns the interpretation of the term "no material increase," and whether this guideline should be converted to a definable metric greater than, less than, or equal to 15%. These are all distressing possibilities to consider, because there is no statistically valid interpretation by which 15% would not be considered a material numeric increase. For instance, I would be ecstatic if my employer offered me a very significant 15% raise, and no doubt so would you. Any proposal that attempts to link the concept of "not material" to a 15% benchmark in any manner should be shelved as an unworkable concept that violates both the letter and spirit of the SLMP.

3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Allie Delventhal

Naples, FL 34114

From: Patrick Zelko
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 8:26:03 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Patrick Zelko

Lake Placid, NY 12946

From: Stephanie sears
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 8:09:21 PM

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Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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2) What constitutes a material increase in road mileage?

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Stephanie sears
49 Church St
Saranac Lake, NY 12983

From: Susan La Sala
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 7:55:03 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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2) What constitutes a material increase in road mileage?

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Susan La Sala
228 Meads Mt Rd
Woodstock , NY 12498

From: Donna Rose
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 7:37:10 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Donna Rose
330 Goshen Turnpike
Middletown , NY 10941

From: Christopher Buckley
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Sunday, July 10, 2022 3:27:57 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

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3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

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In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

I would like to add that roads fragment the forest. I'm tired of hearing that it's only an acre here and there. I enjoy the remoteness that the Adirondacks provide.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Christopher Buckley
10 Kelly Meadow Road
Burnt Hills, NY 12027

From: Michael King
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 6:57:23 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

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3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Michael King
10 Old Forge Rd
Greenwich , CT 06830

From: Justin Mawhir
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 6:29:26 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Forever Wild
Justin Mawhir

Pittsford, NY 14534

From: Richard Conney
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 6:22:58 PM

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Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Richard Conney
81 Evergreen Lane
Jay, NY 12941

From: Lisa Mazzola
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 6:07:34 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

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I therefore make the following arguments in support of my position:

1) The ceiling of "no material increase" is not just about mileage, but all motorized uses and their effects upon the Wild Forest character. The APA's focus is better served by considering a reasonable interpretation of the meaning of "Wild Forest character" and using metrics that better measure it. In several places the SLMP speaks directly to the issue of appropriate locations for motorized use, with preference to travel corridors and borders of Wilderness and Wild Forest areas, avoiding motorized access to the heart of larger areas and thus preserving remoteness. This suggests that defining a metric to the evaluate remoteness would be as good a means—if not superior—to gauge the health of the Forest Preserve than the length of roads and snowmobile trails.

2) The APA's question #2 concerns the interpretation of the term "no material increase," and whether this guideline should be converted to a definable metric greater than, less than, or equal to 15%. These are all distressing possibilities to consider, because there is no statistically valid interpretation by which 15% would not be considered a material numeric increase. For instance, I would be ecstatic if my employer offered me a very significant 15% raise, and no doubt so would you. Any proposal that attempts to link the concept of "not material" to a 15% benchmark in any manner should be shelved as an unworkable concept that violates both the letter and spirit of the SLMP.

3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Lisa Mazzola
1723 W Followthru Dr
Tampa, FL 33612

From: Erik Block
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 5:49:01 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

Any interpretation of the SLMP's stipulation "there will not be any material increase in mileage of roads" must incorporate the SLMP's broader limitation of motorized use and preservation of the essentially wild character of Wild Forest lands. I do not believe that the proposed guidelines should be promulgated without a broader scope that defines and addresses other factors that affect not just the length, but the volume and impact of all motorized activity in Wild Forest areas.

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3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

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In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Erik Block
PO Box 422
Hadlyme, CT 06439

From: Bonnie Faith-Smith
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 5:43:29 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

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3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

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In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Bonnie Faith-Smith
290A Washington Street
Cambridge , MA 02139

From: james Sullivan
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 6, 2022 5:37:10 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

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In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

I regularly hike the ADK.
Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
james Sullivan
313 menahan st.
brooklyn, NY 11237

From: John Blaser
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Monday, July 4, 2022 10:52:18 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

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3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
John Blaser
69 Maple Wood Drive
Brewster, NY 10509

From: Russ Byer
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, June 30, 2022 7:55:15 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

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2) The APA's question #2 concerns the interpretation of the term "no material increase," and whether this guideline should be converted to a definable metric greater than, less than, or equal to 15%. These are all distressing possibilities to consider, because there is no statistically valid interpretation by which 15% would not be considered a material numeric increase. For instance, I would be ecstatic if my employer offered me a very significant 15% raise, and no doubt so would you. Any proposal that attempts to link the concept of "not material" to a 15% benchmark in any manner should be shelved as an unworkable concept that violates both the letter and spirit of the SLMP.

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Russ Byer

Rochester, NY 14468

From: George Lloyd
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, June 30, 2022 5:46:39 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
George Lloyd
127 West Cayuga St
Oswego, NY 13126

From: Kathe Garbrick
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Saturday, July 9, 2022 2:35:43 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Kathe Garbrick
2944 Keats Ave
Manhattan, KS 66503

From: Bill Ingersoll
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, June 30, 2022 7:22:14 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Bill Ingersoll
7123 Trenton Rd
Barneveld, NY 13304

From: Jon Miller
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Friday, July 8, 2022 8:12:47 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

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I therefore make the following arguments in support of my position:

1) The ceiling of "no material increase" is not just about mileage, but all motorized uses and their effects upon the Wild Forest character. The APA's focus is better served by considering a reasonable interpretation of the meaning of "Wild Forest character" and using metrics that better measure it. In several places the SLMP speaks directly to the issue of appropriate locations for motorized use, with preference to travel corridors and borders of Wilderness and Wild Forest areas, avoiding motorized access to the heart of larger areas and thus preserving remoteness. This suggests that defining a metric to the evaluate remoteness would be as good a means—if not superior—to gauge the health of the Forest Preserve than the length of roads and snowmobile trails.

2) The APA's question #2 concerns the interpretation of the term "no material increase," and whether this guideline should be converted to a definable metric greater than, less than, or equal to 15%. These are all distressing possibilities to consider, because there is no statistically valid interpretation by which 15% would not be considered a material numeric increase. For instance, I would be ecstatic if my employer offered me a very significant 15% raise, and no doubt so would you. Any proposal that attempts to link the concept of "not material" to a 15% benchmark in any manner should be shelved as an unworkable concept that violates both the letter and spirit of the SLMP.

3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Jon Miller

Charlotte, VT 05445

From: Saikat Chakraborty
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 6:39:51 PM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

Any interpretation of the SLMP's stipulation "there will not be any material increase in mileage of roads" must incorporate the SLMP's broader limitation of motorized use and preservation of the essentially wild character of Wild Forest lands. I do not believe that the proposed guidelines should be promulgated without a broader scope that defines and addresses other factors that affect not just the length, but the volume and impact of all motorized activity in Wild Forest areas.

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Saikat Chakraborty
7777 STATE ROUTE 30
Paul Smiths, NY 12970

From: Sandra Materi
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 11:03:02 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Sandra Materi
1600 W Odell Ave
Casper, WY 82604

From: Gino Smth
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 10:01:38 AM

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Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Gino Smth
40 Newport Patkway, Apt 2705
Jersey City, NJ 07310

From: Laurie Conney
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 8:26:05 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Laurie Conney
81 Evergreen Lane
Jay, NY 12941

From: Susan Weeks
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Thursday, July 7, 2022 7:38:36 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Susan Weeks
459 Stoll Road
Saugerties, NY 12477

From: John Fritzen
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 13, 2022 8:21:13 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

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3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

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Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
John Fritzen
5839 Bull Hill Road
LaFayette, NY 13084

From: Jack Delehanty
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase
Date: Tuesday, July 5, 2022 6:43:02 PM

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

How could it be?? The Agency does not understand that by soliciting a new ""Guideline"" for ""interpreting"" an existing rule restricting motorized vehicles in state land it is actually encouraging more incompatible uses there? Not everyone within the Blue Line is as dumb as those of you in Ray Brook think. Gone are the days of Park protection at the apa.

Sent from Mail for Windows

Virus-free. www.avast.com

From: Amy Moore
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Preserve the wild forest
Date: Wednesday, July 6, 2022 8:38:36 PM

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

To whom it may concern,

Please ban all further more motorized usage to the forest . Please preserve the wild life.

Thank you!!!

Sent from my iPhone

From: Richard & Monique Cunningham
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 12, 2022 3:59:28 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Richard & Monique Cunningham <rcunningham@passonnopaints.com>
181 Pinewoods Ave
Troy, N.Y. 12180

From: Phyllis Bloom
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:50:18 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Phyllis Bloom <filibe3@gmail.com>
48H Brittany Drive
West Hurley, NY 12491

From: Marty Manjak
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4
Date: Tuesday, July 5, 2022 2:08:21 PM

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

To paraphrase Shakespeare, a road by any other name, or classification, would still function as a road, whether it be in conservation easements, wild forest, intensive use, primitive or state administration areas. Short of clear cutting and condo erection, roadways for motorized vehicles are the most disruptive build outs humans can impose on natural areas, imposing artificial boundaries on contiguous ecological systems and the animals that inhabit them.

The APA's arbitrary designation of roads only in wild forest areas for the purpose of establishing a "baseline" number for expansion overlooks hundreds of miles of roadways in other Adirondack forest recreation areas.

Further, the proposed 15% increase cannot be honestly considered anything less than "material" and violates Wild Forest Basic Guideline No. 4.

The APA needs to go back to the drawing board and consider their proposed rule iinterpretation in light of all roadways impacting recreational areas in the park, and trim its estimate down to the level where it would truly have "no material increase." This would demonstrate the APA's good faith in honoring the letter as well as the spirit of Wild Forest Basic Guideline No. 4.

Thank you,

Martin Manjak
Albany, NY

From: Gerald Malovany
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 2:06:03 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Gerald Malovany <malovany@netzero.net>
PO BOX 1462
Bolton Landing, NY 12814

From: Jerry Ross
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 2:05:41 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Jerry Ross <jmross1971@yahoo.com>
29 Elm St.
Peru, NY 12972

From: thomas p. warner
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:57:41 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

thomas p. warner <tom@alexanderpoole.com>
2513 brookview road
Castleton On Hudson, NY 12033

From: Rosemary Pusateri
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:52:09 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Rosemary Pusateri <pusateri14@aol.com>
75 mason rd
Cleverdale, NYS 12820

From: Nancy Scarzello
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:51:50 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Nancy Scarzello <forestbay@wcvt.com>
101 Hall Rd.
Ticonderoga, NY 12883

From: Barry Oreck
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:51:35 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Barry Oreck <barryoreck@gmail.com>
291 Prospect Place
BROOKLYN, NY 11238

From: Nancy Scarzello
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:50:42 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Nancy Scarzello <forestbay@wcvt.com>
101 Hall Rd.
Ticonderoga, NY 12883

From: John C Lieff
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:46:57 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

John C Lieff <kilkane@aol.com>
4112 41st Street, Apt. 6L
Sunnyside, New York 11104

From: deborah meyers
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:46:13 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

deborah meyers <dmeyers@skidmore.edu>
113 catherine street
SARATOGA SPRINGS, NY 12866

From: Roger Gray
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 8:48:59 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Roger Gray <rtg50@aol.com>
224 Jay Street
Albany, NY 12210

From: Carolyn A Cyr
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:38:36 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Carolyn A Cyr <cpw3cyr@gmail.com>
165 Combs Rd
Warrensburg, NY 12885

From: Daniel Willner
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:27:00 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Daniel Willner <danielwillner@yahoo.com>
190 Cherry Street
Katonah, NY 10536

From: James Visconti
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:11:59 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

James Visconti <jimandginger@hotmail.com>
222 Union Falls Rd
AuSable Forks, NY 12912

From: Patti P. Gillespie
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:10:07 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Patti P. Gillespie <ppgkmc@icloud.com>
PO Box 184
Forestport, NY 13338

From: Lynn Johnson
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:09:14 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Lynn Johnson <lynnmariejohnson@gmail.com>
3213 State Route 9L
Lake George, NY 12845

From: Ann Woodward
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:06:19 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Ann Woodward <ann.woodward@aol.com>
55 West 14th Street, Apt15A
New York, NY 10011

From: Lawrence L Master
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 1:03:15 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Lawrence L Master <lawrencemaster@gmail.com>
42 Fisk Way, PO Box 253
Keene, NY 12942

From: Peter Bauer
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 9:52:20 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Peter Bauer <peb1962@gmail.com>
PO Box 167
Blue Mountain Lake, NY 12812

From: Arthur W Haberl
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 8:46:27 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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7. Simply put, the Forever Wild lands of the Forest Preserve do not need any attempt to tame their wild nature. Attempts to open roads and attempts to provide more motorized transit are not in keeping with the clear intent of the Forever Wild provisions of the New York Constitution.

Thank you very much.

Sincerely,

Arthur W Haberl <ahaberl@nycap.rr.com>
45 Chestnut Lane
Niskayuna, NY 12309

From: bruce Krug
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 8:20:49 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

bruce Krug <krugvale@yahoo.com>
2771 West Road
Constableville, New York 13325

From: Robert Manning
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 8:15:29 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Robert Manning <remremrem99@gmail.com>
12 Cross Rd.
Johnsburg, NY 12843

From: Carolyn Bishop
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 8:06:19 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road. It is very obvious that a road of any size, width and/or use is not desirable in a
forest/field landscape that is meant to be undamaged. It is vital that what remains of our precious natural preserved Adirondacks must be protected, not developed. Please preserve!

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Carolyn Bishop <cbishopma@icloud.com>

7 Orchard Street. and. 175 Scott Road
Belmont and Caroga Lake, MA. and. NY 02478 12032

From: Stephen Shafer
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 7:46:36 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Stephen Shafer <sshafer1121@gmail.com>
40, Scott Drive
Malone, New York 12953

From: Patricia Packer
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 6:57:58 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Patricia Packer <pattiac@nycap.rr.com>
5 Jennifer Rd
Scotia, NY 12302

From: Constance Dodge
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 6:17:23 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Constance Dodge <cdodgeart@gmail.com>
936 South Shore Road
Edinburg, NY 12134-5933

From: Charles E. Heckler
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 5:21:41 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Charles E. Heckler <charles.heckler@gmail.com>
205 McKinley St
Lake Placid, NY 12946

From: Styra Eisinger
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 12, 2022 10:11:51 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Styra Eisinger <savins@att.net>
953 Ironbridge Road
Asbury, New Jersey 08802

From: Eileen C. Egan Mack
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 5:19:38 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4
e?

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

The APA needs to live up to its original mission which is to protect the forest lands and water in this unique confluence of public and private lands. The Master Plan requires the APA to put conservation and preservation of the habitat and all the diversity of life ahead of development and man-made projects. While visually, to the human eye, a dirt road may not seem like a drastic change to a natural habitat, but its impact can be measured in a variety of ways. The removal of trees is not a loss the environment for the Adirondacks or the world can afford. The road will disrupt plant and animal life, and cause stress to these living beings. The increase in human traffic will also create more stress on the environment, the plant and animal life. What is so difficult about holding to the tenets of the AP State Master Plan and the idea of saving lif

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4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%. This is a big variation in numbers. Now calculate the difference this variable will make on the environment.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve. I repeat, the "full impact of all roads." An honest assessment must occur.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild

Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

To whom is the APA obligated? I hope the answer includes the life within the Blue Line, the future of that life, and the future of the life of the planet and the dream we must hold for our children and grandchildren to preserve this special place.

Thank you very much.

Sincerely,

Eileen C. Egan Mack <leenie151@gmail.com>
16. Vandenburg Lane
Latham, NY 12110

From: Georgia E Jones
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 3:28:37 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Georgia E Jones <georgia11@roadrunner.com>
8 Grandview Avenue
Lake Placid, NY 12946

From: francis thomas coppa
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 3:14:49 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

francis thomas coppa <fcoppa@nycap.rr.com>
51 Capitol Place
Rensselaer, NY, Rensselaer 12144

From: DAVID MYERS
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4
Date: Monday, July 11, 2022 3:07:07 PM

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Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips,

My comments below are directed to the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. Roads have the greatest negative impact to an intact forest system.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

David Myers
141 Cedar Ln
Blue Mountain Lake, NY 12812

From: Susan Hoekstra
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 3:04:03 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Susan Hoekstra <susan.hoekstra.writer.editor.llc@gmail.com>
122 Kibler Point Road
Wells, New York 12190

From: melinda broman
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 2:36:28 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

melinda broman <mbroman@galaxy.net>
160 congress st.
brooklyn, NY 11201

From: Miriam Gross
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 2:31:27 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Miriam Gross <m1952@aol.com>
34 Elmore Rd
Rochester, NY 14618

From: Kevin Oldham
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 2:20:24 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Kevin Oldham <koldham61@gmail.com>
2056 Fish Creek CT
Ballston Spa, New York 12020

From: Norman R. Kuchar
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 12:55:34 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Norman R. Kuchar <nkuchar@nycap.rr.com>
60 Fredericks Road
Glenville, NY 12302

From: Daniel J Ling
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 12:44:41 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

The top priority of the APA in managing the Forest Preserve, which should affect all others, is the protection of the resources. That means not allowing degradation of the existing conditions as much as possible. I am against the construction of new roads in the Forest Preserve, period. The only way the Adirondack Forest Preserve will be as wild 500 years from now as it is today, is if we allow ZERO net new road construction. In fact, we should be abandoning roads in very wild areas. We must take a very long view, otherwise we are not stewarding the land as it has been up to now.

Sincerely Yours,

Sincerely,

Daniel J Ling <djl2@nycap.rr.com>
326 Middle Grove Rd.
Middle Grove, NY 12850-1105

From: rosemary Healey pusateri
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 12, 2022 8:17:01 AM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

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Thank you very much.

Sincerely,

rosemary Healey pusateri <pusateri14@aol.com>
75 Mason Rd
Cleverdale, NY 12820

From: bonnie v cook
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 12:36:41 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

My family have been Adirondackers for over 200 years, and I do not want to see the forests and the mountains overrun with roads and more vehicles. Stop expanding roads!

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

bonnie v cook <bonnievcook@gmail.com>
2 snyder road
west sand lake, NY 12196

From: James Giardina
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 12:28:39 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

James Giardina <jimg8it@hotmail.com>
PO BX 98
Erieville, N Y 13061

From: Nancy Bernstein
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 12:02:56 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Nancy Bernstein <nbernstein12@gmail.com>
224 Swinyer Rd
Vermontville, NY 12989

From: Ernest E (Lee) Keet
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 11:57:15 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Ernest E (Lee) Keet <lee@vanguardatlantic.com>
62 Moir Road
Saranac Lake, New York 12983

From: Barbara Luhn
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 11:26:55 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Adding a personal note, I spent all the summers of my childhood and teen years in Coreys. My mother later lived in Ray Brook for several years. The Adirondacks and their beauty deserve to be protected and treasured. Thank you very much.

Sincerely yours,

Sincerely,

Barbara Luhn <baluhn@windstream.net>
684 Wildwood Circle
Clarkesville, GA 30523

From: Alan Hasselwander
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 11:08:31 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Alan Hasselwander <alan@hasselw.com>
4 Harvey Road
North River, NY 12856

From: William Koebbeman
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 10:37:35 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

I am very concerned about this attempt to expand roads in the Adirondack Park through a loose reinterpretation of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4. I want to see APA and DEC use only the most restrictive interpretation of the definition of roads and rules governing total miles of roads in the entire park including State easements on private land. The following comments express my detailed comments for the hearing.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

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Thank you very much.

Sincerely,

William Koebbeman <wkebb2@nycap.rr.com>
861 Riverview Road

Rexford, NY 12148

From: David Ellison
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 10:14:57 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

David Ellison <davidellison726@gmail.com>
16 East Bayberry Road
Glenmont, NY 12077

From: James A, Grossman
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 10:11:26 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

James A, Grossman <hombregrande525@gmail.com>
525 W.238th St. Apt. 2A
Bronx, new york 10463

From:	Carl Jenner
To:	SLMP_UMP_Comments@apa.ny.gov
Subject:	Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date:	Monday, July 11, 2022 10:07:34 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Carl Jenner <cjenner@frontiernet.net>
135 Fisher Rd
Gloversville, NY 12078

From: Jane Alpert
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 12, 2022 7:45:47 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Jane Alpert <janealpert@gmail.com>
574 Old Furnace Road
Crown Point, NY 12928

From: chris jay cohan
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:50:45 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

chris jay cohan <ccohan9355@aol.com>
21 loon over lane, Apt, Suite, Bldg. (optional)
Saranac lake, NY 12983

From: Stephen J Woodard
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:47:03 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Stephen J Woodard <eighteenwestnotredame@yahoo.com>
139 Wineberry Ln
Malta, New York 12020-4721

From: Deborah Meyers
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:45:42 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.
Roads destroy wilderness!! And the sanctuary of wilderness is more necessary for everyone--downstaters and upstaters--now than ever! Just at the extraordinary use of the Adirondack Park by ALL New Yorkers in these challenging COVID times. Roads would irrevocably destroy the park.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Deborah Meyers <dmeyers@skidmore.edu>
113 catherine street
saratoga springs, NY 12866

From: Patricia Carapellucci
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:36:36 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Patricia Carapellucci <pcarapellucci@aol.com>
11252 Ranetto Place
Lake View Terrace, California 91342

From: David Safrany
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:35:58 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

David Safrany <kiosk@coastside.net>
11252 Ranetto Pl
Sylmar, CA 91342

From: john k mulvey
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:28:18 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

john k mulvey <jkmulvey@gmail.com>
45 alpine dr
latham, NY 12110

From: Mildred Gittinger
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:26:27 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Mildred Gittinger <gittinger@verizon.net>
1197 S Cntry Clb Dr
Schenctady, ny 12309

From: Lauren Luckert
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:18:12 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Lauren Luckert <lauren.grupp@gmail.com>
503 Maple Grove Road
Northville, NY 12134

From: Robert W. Finnegan
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 9:17:09 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

As a landowoner in Keene Valley, NY, the heart of te Adorondacks, I am very concerned with the unwarranted and overly liberal interpretation of the Adirondack Park State Land Master Plan.
Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Robert W. Finnegan <bobbwf@aol.com>
31 Rundelane

Bloomfield, CT 06002

From: Ron Gonzalez
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Sunday, July 10, 2022 9:36:09 AM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The construction and maintenance of a road always negatively impacts an intact forest system.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is obviously a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Ron Gonzalez <iamrongon@gmail.com>
56 Sterling Street
Beacon, NY 12508

From: Ben Kroup
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 12, 2022 5:28:58 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Ben Kroup <bakroup@aol.com>
51 Second St.
waterford, NY 12188

From: Brittany Lagaly
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Saturday, July 9, 2022 12:54:06 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

A land bisected by roads is not a wild land. As a plant ecologist employed in the battle against invasive species, I strongly oppose the destruction of state held wild forest in the pursuit of creating more roads for motor vehicles.

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Brittany Lagaly <lagaly@hws.edu>

215 Heisey Rd
Willseyville, NY 13864

From: Ellen C. Collins
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Saturday, July 9, 2022 10:13:11 AM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Ellen C. Collins <17ellencollins@gmail.com>
PO Box 156, 3339 State Route 28
Blue Mountain Lake, NY 12812

From: JEFFREY A LEVITT
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Friday, July 8, 2022 5:26:01 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

JEFFREY A LEVITT <laborerman@yahoo.com>
175 WHITEHALL ROAD
ALBANY, NY 12209

From: Margaret B. Moore
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Friday, July 8, 2022 12:26:30 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

In addition to the comments below, please add this strong word of opposition. I am vehemently opposed to any expansion of roads in the Adirondack Park area now under consideration. Also any area used by any motor vehicle must be included in the consideration of roads allowed. If any motor vehicle uses the path for any reason it should be considered in the total roads counted. A road is a road if it can ever be used as a road.
Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Margaret B. Moore <cmoore4@nycap.rr.com>
983 Ballowon Road

Niskayuna, New York 12309

From: Penny H. Jolly
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Friday, July 8, 2022 12:16:16 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Penny H. Jolly <pjolly@skidmore.edu>
35 Pinewood Avenue AND 2074 Blue Ridge Road
Saratoga Spgs AND North Hudson, NY, NY 12866-2622 AND 12855

From: Patricia Vineski
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Friday, July 8, 2022 6:47:23 AM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Patricia Vineski <vineskipatricia@gmail.com>
76 E Hill Rd
South Colton, NY 13687

From: Lisa Bellamy
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4
Date: Thursday, July 7, 2022 3:55:51 PM

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RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

My husband and I own a second home in Upper Jay, NY. We have read information about this issue and submit the comment below.

Lisa and Peter Bellamy
505 9th Street, Apt. 4L
Brooklyn, NY 11215

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

From: Patricia Vineski
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Thursday, July 7, 2022 1:32:55 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Patricia Vineski <vineskipatricia@gmail.com>
76 E Hill Rd
South Colton, NY 13687

From: Dave Hughes
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Thursday, July 7, 2022 1:31:31 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Forever Wild is an increasingly difficult goal, but also increasingly important. When the park was founded, only 62 million people lived in the entire US. Today, almost 20 million live in NY State alone. The original intention of keeping the Adirondack Park a truly wild place must be upheld. Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Dave Hughes <davebhughes@me.com>

20 Twitchell Lake
Big Moose, NY 13331

From: Trish Pielnik
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Thursday, July 7, 2022 11:23:47 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Trish Pielnik <ptrish777@gmail.com>
PO Box 465
Potsdam, NY 13676

From: Mary A
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 11:48:45 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Mary A <maryann_weber@urmc.rochester.edu>
PO Box 906
Scottsville, New York 14546

From: Lawrence D"Arco
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Thursday, July 7, 2022 8:49:36 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

I am very concerned about expanding road usage by vehicles in the Adirondacks.

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

Lawrence D'Arco <abelincoln1863@yahoo.com>
1202 Greenwich Dr

Albany, New York 12203

From: Alex Brissenden
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 1:57:15 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Alex Brissenden <austinstorsberg@gmail.com>
10903 prospect depot road
Remember, Colorado 80534

From: Kayla Chetney
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 12:45:18 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Kayla Chetney <kaylachetney@gmail.com>
248 Maplewood Ave, Unit 2
Portsmouth, NH 03801

From: Elaine Sperbeck
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 12:32:15 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Elaine Sperbeck <ejsperbeck@yahoo.com>
618 E Monroe streeet
Little Falls, new York 13365

From: Marisa Hall
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 11:52:54 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Marisa Hall <marisa.hall675@gmail.com>
171 Main St
Montpelier, Vermont 05602

From: Edmund Gerhardt Storsb
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 11:44:52 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Edmund Gerhardt Storsb <storsbergg@gmail.com>
10903 Prospect Depot Road
Remsen, NY 13438

From: Stephanie Vaus
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 11:05:38 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Stephanie Vaus <svauscreativeworks@gmail.com>
3 combs rd
Warrensburg, NY 12885

From: Mollie Christianson
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 10:52:42 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

I feel so passionate about protecting this amazingly unique wilderness we inhabit. I want to do whatever I can to help the animals and the environment thrive, and I hope you do too!

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Mollie Christianson <molliejchristianson@gmail.com>

18 finkle rd
Bolton landing, NY 12814

From: Bonnie Vicki
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 10:08:19 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

I agree with Protect the Adirondacks view on roads in the forest preserve. Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Bonnie Vicki <bonnie.denman@gmail.com>
PO Box 105, 536 Igerna Rd
Pottersville, NY 12860

From: Marilyn Sargent
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 8:40:33 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Marilyn Sargent <marilynsargent414@gmail.com>
936 South Shore Road
Edinburg, NY 12134-5933

From: Mary Weber
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 11:48:37 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Mary Weber <maryann_weber@urmc.rochester.edu>
PO Box 906
Scottsville, New York 14546

From: Samantha L Brooks
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 7:26:17 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Samantha L Brooks <slbrooks246@gmail.com>
82 Church Street
SARANAC LAKE, NY 12983

From: Robert W Shwajlyk
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 7:25:44 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Robert W Shwajlyk <march25@nycap.rr.com>
161 East State Street Ext
Gloversville, NY 12078

From: Ian K Strzelecki
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 7:01:29 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Ian K Strzelecki <ikstrzel@gmail.com>
82 CHURCH ST
SARANAC LAKE, NY 12983

From: Ben Kroup
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 5:40:23 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Ben Kroup <bakroup@aol.com>
51 Second St.
waterford, NY 12188

From: Heather Hollister Kaese
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Wednesday, July 6, 2022 1:50:04 AM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Heather Hollister Kaese <heatherhollister@gmail.com>
19 Redcrown
Mission Viejo, CA 92692

From: Debra Naumovitz
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 10:08:44 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Debra Naumovitz <psychopractor@aol.com>
6015 Johnston Rd
Slingerlands, NY 12159

From: Stephen J Woodard
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 9:06:18 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Stephen J Woodard <eighteenwestnotredame@yahoo.com>
139 Wineberry Ln
Malta, New York 12020-4721

From: Dr. Daniel Nicponski
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 9:05:15 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Regarding the public hearing on the interpretation of the APSLMP, Wild Forest Basic Guideline No.4: The DEC and APA need to stop attempting to increase technological incursion into forest preserve lands. What part of "Shall be kept forever wild" is unclear? An increase in navigable roadways by any vehicular propulsion mechanism (e.g., car, snowmobile, dirt bike) is incongruous with the intention of the forest preserve.

Any and all decisions and/or interpretations must ensure navigable mileage does not increase.

Thank you very much.

Sincerely,

Dr. Daniel Nicponski <daniel.nicponski@gmail.com>
11 Rolling Ridge Dr.
East Greenbush, New York 12061

From: Dale & Bonnie Lewis
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 8:44:27 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

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6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Dale & Bonnie Lewis <dwlewis14424@aol.com>
4171 Angela Way
Canandaigua, NY 14424

From: Michael Basehart
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 7:14:16 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

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Thank you very much.

Sincerely,

Michael Basehart <mbasehart@hotmail.com>
20 Sunset Ridge
Mountain View, New York 12969

From: Susan S Blakeney
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 10:54:15 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Susan S Blakeney <blakeneysj@yahoo.com>
481 Clove Road
Monroe, NY 10950

From: william logan fox
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 7:14:14 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

william logan fox <WMLOGAN.FOX@GMAIL.COM>
122 hewitt road
New York, NY 12851

From: Ronald Larsen
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 7:04:11 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Ronald Larsen <rlarsen01@twcny.rr.com>
174 CR 35
Canton, NY 13617

From: Craig A. Emblidge
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 6:40:57 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Craig A. Emblidge <cemblidge@roadrunner.com>
29 Owen Avenue
Queensbury, New York 12804

From: Stephen F Smith
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 6:34:12 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Stephen F Smith <moe144@hotmail.com>
7 Forest Ave
Troy, NY 12180

From: Ewa Hammer
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 5:42:40 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Ewa Hammer <ewahammer@mac.com>
4441 Stack Blvd, Apt C242
Melbourne, FL 32901

From: Chris Gonzales
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 4:38:59 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

I'm against expansion of roads in the Adirondack State Park Land wild forest. I think roads should be restricted to minimal use. Why are more expansive definitions of roads being considered? Roads disrupt ecosystems and the environment. The expansion of roads should be limited.

Sincerely,

Chris Gonzales
2074 Blue Ridge Road
North Hudson, NY 12855

Mailing Address:
119 Northview Rd.
Ithaca, NY 14850

Sincerely,

Chris Gonzales <gonzales9@gmail.com>
2074 Blue Ridge Rd.
North Hudson, NY 12855

From: Phyllis K. Georges
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 4:02:37 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Phyllis K. Georges <pkgeorges@aol.com>
88 Village Green Drive
Port Jefferson Station, New York 11776

From: Carol Auer
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 4:02:33 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Carol Auer <auer732@gmail.com>
6 Millbrook Ter
New Paltz, New York 12561

From: Susan Oehser
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 3:49:35 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Susan Oehser <soehser@earthlink.net>
1845 Manzanita Drive
Oakland, CA 94611

From: Sally Thurston
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 3:46:59 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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Thank you very much.

Sincerely,

Sally Thurston <sallythurston2@gmail.com>
15 Commons Way
Hague, New York 12836

From: Jane and Kenneth Robbins
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Monday, July 11, 2022 10:53:19 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

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6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Jane and Kenneth Robbins <robbinsjk@nycap.rr.com>
21 Beechwood Drive
Burnt Hills, NY 12027

From: David Brauer
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 3:46:42 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

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Thank you very much.

Sincerely,

David Brauer <dbrauer31@msn.com>
74 Forest Brook Dr
Lake Placid, NY 12946

From: Robert Burt
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 3:41:19 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Robert Burt <rfb5@cornell.edu>
200 Burt Rd
Cold Brook, New York 13324

From: Avery Fox
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 3:28:33 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Avery Fox <averysfox@gmail.com>
300, Pitcher Lane
RED HOOK, NY 12571

From: Ronald A Cuccaro
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 3:16:21 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Ronald A Cuccaro <rcuccaro@rphc.com>
126 BUSINESS PARK DR
Utica, NY 13502-6302

From: Kathleen Braico
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 3:04:21 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Kathleen Braico <ktbraico@aol.com>
10 Ashley Pl
Queensbury, NY 12804-2552

From: bruce krug
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 2:50:10 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

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Thank you very much.

Sincerely,

bruce krug <krugvale@frontiernet.net>
2771 West Road
Constableville, New York 13325-2306

From: Amanda Smock
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 2:34:21 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Amanda Smock <addiesmock@yahoo.com>
176 Downs St
Kingston, New York 12401

From: James A, Grossman
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 2:32:00 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

James A, Grossman <hombregrande525@gmail.com>
525 W.238th St. Apt. 2A
Bronx, new york 10463

From: Laura-Jean Schwartau
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 2:31:00 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Laura-Jean Schwartau <schwarl@plattsburgh.edu>
53 Maryland Ave
Saranac Lake, NY 12983

From: Pete Klosterman
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 5, 2022 2:09:13 PM

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TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

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Thank you very much.

Sincerely,

Pete Klosterman <petek@accesscom.com>
372 Central Park W Apt 12A
New York, New York 10025

From: Charles S. Kline
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 12, 2022 6:39:12 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road. Issues of concern include:

- Stream sedimentation – "Sediment movement from forest road systems is a major concern in forest management due to the degrading impacts of stream sedimentation" Citation: Minimizing the Impacts of the Forest Road System @article{grace%2C+johnny+m.+ii2003minimizing, title={Minimizing the Impacts of the Forest Road System}, author={Grace, Johnny M. III}, journal={In: Proceedings of the conference 34 international cross
- Biodiversity and climate change – "maintaining, and when possible restoring, intact forest systems is critical to sustain biodiversity and slow climate change". Citation: • Watson, J.E.M., Evans, T., Venter, O. et al. The exceptional value of intact forest ecosystems. Nat Ecol Evol 2, 599–610 (2018). https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdoi.org%2F10.1038%2Fs41559-018-
&data=05%7C01%7CSLMP_UMP_Comments%40apa.ny.gov%7C755dbb071a3b42ad80270bfada45756c0%7C3f6cb8ea79004d108cebb8bc6c1c81ec7%7C0%7C0%7C637932623528510625%7CUnknown%7CTWFpbGZsb3dlRyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6MmF9%3D%7C3000%7C%7C%7C&sdata=IqXMFomnb8CUQ3cRq4GDCPX4o7Rc220y62ng6%2F%2Fg%3D&reserved=0
- Spread of Invasive, nonnative plants – "Importance of roads for weed distribution and spread … it is clear that monitoring invasive plants within treated areas and along roads should be a permanent component of forest restoration". Citation: Unwanted side effects of roads are invasive species
- Spread of invasive, nonnative plants – "The results showed that, in general, invasive plant richness decreased as distance from a road increases. Additionally, forests associated with land uses such as agriculture and development have higher invasive plant richness pressure and larger road effects (measured in distance) than forests in more natural settings" Citation: Taylor, Benjamin S., "Impacts of Roads on Non-Native Plant Invasions into U.S. Forests under Different Land-Use and Ecoregion Settings" (2018).

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url=https%3A%2F%2Docs.lib.purdue.edu%2Fopen_access_theses%2F1601&data=05%7C01%7CSLMP_UMP_Comments%40apa.ny.gov%7C755dbb071a3b42ad80270bfada45756c0%7C3f6cb8ea79004d108cebb8bc6c1c81ec7%7C0%7C0%7C637932623528510625%7CUnknown%7CTWFpbGZsb3dlRyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6MmF9%3D%7C3000%7C%7C%7C&sdata=O5IUVIhiIu5f0%2FkcfW4ns7UcIErdwmMBDD7FR5DFmBtKk%3D&reserved=0

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of "no material increase" than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

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7. Please accept the comments above from someone with over twenty years of experience paddling, hiking and fishing in the ADKs.

Thank you very much.

Sincerely,

Charles S. Kline <klineo46@gmail.com>
314 Pembroke Road
Bala Cynwyd, PA 19004

From: Kierin Bell
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on the Adirondack Park State Land Master Plan's Wild Forest Basic Guideline No. 4
Date: Monday, July 11, 2022 10:41:42 AM

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

Dear Megan Phillips and Adirondack Park Agency,

I feel that several important considerations were not addressed in any of the tentative proposals presented at the May and June sessions concerning APA's interpretation of Wild Forest Basic Guideline No. 4, and I respectfully submit the following comments:

1. By itself, a single benchmark for material increase in road mileage for all Wild Forest lands in the Park combined (e.g., 15% of 211.6 miles) lacks the granularity required to properly define material increase according to the SLMP. Such a benchmark is decoupled from the on-the-ground, localized impacts of motorized use that are addressed in the SLMP, leaving ample room for substantial, non-conforming increases in road mileage within any given Wild Forest unit. Further, since Wild Forest areas are currently managed as individual units rather than collectively, establishing consistent and explicit limits for road mileage on a per unit basis (with or without additional whole Park limits) will better inform the management process.

2. Although there exists no single metric that can account for wild forest character, it is at least clear that the relationship between wild forest character and road mileage is not linear. As some have rightfully pointed out, as road mileage has increased in specific Wild Forest units, so has Wild Forest acreage with the continuing acquisition of adjacent private lands and their subsequent incorporation into the Forest Preserve. However, for every percent increase in a given area, distances between points within that area increase by only a much smaller proportion. Conversely, for every percent increase in road mileage, fragmentation and accessibility increase disproportionately. Rather than defining material increase as a percent increase above an absolute road mileage, or in terms of miles of road per acre of Wild Forest, some aspect of the definition for material increase should reflect this non-linear relationship between area and distance. One possible way to do this would be to define material increase relative to the square root of the area of each management unit. For example, considering a definition for material increase in road mileage as an increase of more than 15% of the square root of each Wild Forest unit area (in square miles), the maximum allowable increase in road mileage for a 100 square mile Wild Forest unit would be 1.5 miles, whereas the maximum allowable increase in road mileage for a 50 square mile Wild Forest unit would be approximately 1 mile. Such a calculation always roughly approximates the distance to span 15% of the diameter of a circle with a given area. This is a much more reasonable metric than a 15% increase above 1972 road mileage, as that metric varies widely for each Wild Forest unit regardless of its respective size and its capacity to withstand

additional use.

3. No CP-3 routes should be exempt from Wild Forest Basic Guideline No. 4, not even those tied to the Galusha settlement. Based on the DEC's list of MAPPWD routes, numerous CP-3 routes on Wild Forest are not gated, and there may be overlap between various measurements for road mileage and CP-3 mileage. In addition to attesting to the artificial nature of the distinction between CP-3 and non-CP-3 road mileage, this raises concerns that such a distinction will result in an inaccurate or improper definition of material increase.

4. According to the measurements presented in May, the increase above 1972 road mileage already far exceeds 15% for 12 out of the 27 Wild Forest units in the Park (inclusive of the 4 units that had any increase above zero road mileage since 1972); and when accounting for existing and proposed CP-3 routes, this number rises to 13 out of 27 (though note well concerns above about double-counting mileage). When considering increase in road mileage as a proportion of the square root of each Wild Forest unit area (in square miles), 10 out of 27 Wild Forest units now exceed a 15% increase (11 out of 27 when considering existing and proposed CP-3 routes), though generally by a smaller margin than in the former case. This reinforces the point that a single benchmark for material increase in road mileage for all Wild Forest lands in the Park combined is inadequate -- especially when set at 15% above total road mileage in 1972 -- and that many Wild Forest areas are already individually at or near material increase in road mileage by any reasonable metric.

(I would gladly provide a spreadsheet illustrating the numbers above upon request.)

Thank you for your informative presentations on this complex and nuanced issue, and for providing the public with the opportunity to comment.

Sincerely,
Kierin Bell
Amsterdam, NY

From: smichalec9@gmail.com
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Road Expansion
Date: Tuesday, July 5, 2022 3:45:19 PM

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

Dear Sir or Madame:

My family(Great grandparents, grandparents and parents) lived in Lake Placid for many years. We still have family there and visit often from Saratoga Springs. We spent many summers at a state camp on Lower Saranac Lake when I was a child. There came a time when the state asked us to relinquish our camp, so that the land could return to "forever wild". As difficult as this was, my parents understood the need for protecting the legacy of the Adirondacks, so that future generations could find their peace within the borders of the Adirondack Preserve. We are opposed to any further road development or snowmobile trail development in the state park for all the reasons stated above. It is not our job here to use up every natural resource at our disposal, but to leave a legacy of forever wild for the generations to come. I may be wrong, but I thought that creating the APA was part of that plan.

Sincerely,
Sharen Peck Michalec

From: Lee Nellis
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Roads - Its NOT the Miles
Date: Tuesday, May 24, 2022 12:28:03 PM

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

Thanks for accepting comments on this issue.

As I approach 50 years of experience watching public decision-making, I have seen countless situations like this one where the numbers dominate the discussion from the beginning. It could be your current issue with miles of road and trail, or the acreage per dwelling, the number of parking spaces required, the amount of sediment permitted in a TMDL, etc., etc. I've seen all these and learned this:

The numbers are always arbitrary and almost always divisive. If there is a rift (more likely rifts) in a community arguing to the numbers is guaranteed make it worse. Have you all already forgotten the heat generated by the definition timber?. You can only try (and likely fail, though pissing off everyone can work, for a while if you're sure to be even-handed about it) to make everyone equally unhappy.

First, arguing about the numbers ignores what's important: quality or, in landscape planning, we often talk about character. Are all miles of road indeed interchangeable? That's the message in those matrices. BUT we know that different roads have different utility for different user groups, including those with disabilities (but not them alone). We know that roads affect habitat and water quality, and are vectors for invasives. We also know that different roads, differently sited and built, will have different impacts. Reducing this conversation to the number of miles willfully sets all that aside. Should we be talking about pulling roads back from lakeshores instead of counting the miles? about permitting more roads to be built along shorelines? Those are difficult discussions but they are als where there is leverage in protecting this landscape.

Second, arguing to the numbers sets aside the question of goals or, at best, assumes that goals can't be changed. And yet isn't this conversation about what constitutes a "wild forest" and what constitutes "access" of different types? Perhaps the SLMP is outdated? Perhaps it is insufficiently specific? It certainly doesn't provide guidance sufficient to the current task.

Third, someone is bound to respond that all choices about numbers are ultimately arbitrary. That's largely so, and the essence of the problem. It ignores the possibility that land use can be more effectively planned for and regulated on the basis of performance. The suggestion that there could be a different metric is a good place to begin. It is harder to do that, of course, but should managing the amazing resources of the Adirondack Park be easy?

I hope the APA Board members will see that this path leads into a quagmire, that they must pull the conversation back to goals and the facts about the impact of roads in specific parts of the landscape (or have we reached the point where wild forest is just wild forest regardless of its particular ecological attributes and the role it plays in specific communities?). That will take time, including what might be a lengthy public process (thanks to the Board members who advocated for a public forum!). It will require professional expertise that can transcend current perceptions and practice. It could actually, done well, be fun.

That's all, though I am available for questions. Thanks for listening.

From: Nancy Miller
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Roads and motored vehicles in the adk Park
Date: Tuesday, May 17, 2022 1:21:15 PM

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"Forever Wild" means no roads, no off-road vehicles. Atvs are a violation of this designation as is adding anymore roads for any motorized vehicles. Any trails should be foot-path only. Off-road bikes are an assault on the hiker. We have already far desecrated the Forever Wild designation. Perhaps we need a priority list to make it simple:
1. Animals and plants, undeveloped land
2. Humanity no matter how much they want to put themselves first.
That spells it out pretty clearly.
Thank you.

Nancy Miller
106 Vosburgh Rd
Rainbow Lake, NY
814-599-3168

Sent from my iPhone

From: Larry McGory
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Roads and vehicular traffic in the Adirondacks
Date: Thursday, July 7, 2022 7:30:56 PM

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To whom it may concern:

I am strongly opposed to any building of new roads or opening of new areas to vehicular traffic. I believe that the master plan clearly states that anything of the sort shall not happen. I therefore, am opposed to any creative re-interpretation of the document. I am already annoyed that I drive past hundreds of miles of snowmobile trails to get to a five mile ski trail. The presence of these noisy foul smelling vehicles is antithetical to the purpose of the park. Thank you for considering my comments.

Sincerely,

Larry McGory
29 Snell Rd.
Potsdam, NY 13676

From: Joe Kozlina
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Roads in the ADK park.
Date: Saturday, June 18, 2022 9:00:05 AM

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

What type of study do we need other than to look at our Park and the world and decide if we need more roads. The study is done. We have enough roads period. STOP BUILDING ROADS. We have already exceeded the earths capacity to keep up with the human population. What it needs is a HERO to come along and put a stop to this madness called progress. Will you be that HERO? I hope so.
Less is more. Lets take that on as our motto as the conclusion of our study. Thanks Joe Kozlina
Sent from Mail for Windows

From: Richard Jarvis
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Roads in wild forest
Date: Tuesday, July 12, 2022 6:00:10 PM

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

Dear APA AND DEC

The existing SLMP guidelines should be strictly adhered to. Don't ENCOURAGE motorized use AND MATERIAL INCREASE in roads.

Seriously consider the extensive forest roads on more recent conservation easement lands in the context of this issue. The state acquired public use rights to forest management lands with existing and extensive forest roads more appropriate for motorized uses.

Thank you for opportunity to comment.

Sincerely,
Richard Jarvis
Vermontville, NY 12989

From: Rich Benjamin
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Roads
Date: Tuesday, May 17, 2022 8:09:54 PM

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

Providing access is valid for many reasons. No reason to limit roads at all.

Thank you,

Rich Benjamin
Monticello and North Hudson, NY

From: Matthew Kane
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Wild Forest Road comments
Date: Monday, July 11, 2022 8:33:05 PM

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

Good morning,

My name is Matthew Kane and I have a few points to consider. For personal reasons and personal experience I'll focus mostly on MRP road.

First, why is MRP road labeled as it is on this wild forest road APA public comment period?

I'm scratching my head if it's going to be closed. One reason is because of the historic nature of this area. If it is because of people vs. wildlife conflicts, I can assure you that is not what I've found. Downright not many animals in the woods, no matter how far back my brother and I run trail cameras. Birds, bugs, plants/trees and fungi dominate the area. Regardless, I have a hard time understanding. There's easy access to old growth pines throughout the plains, which is part of NYS natural heritage.

Place is great and has a lot to offer the public:

But, there's problems. However, where you and I see a wild blueberry bush, we might think snack w/ possible bear. The majority don't read kiosks and public knowledge is lacking for actual safety. They just see blueberries no other risk than eating a bad one. Honestly, I'd like to see historical numbers (or more) of Forest Rangers in the ADKs. This would decrease the current stressful work loads Forest Rangers have. While increasing patrol and public knowledge of the actual hazards in the area, but highlight berry patches, easy access old growth, etc. and better educate about safeguards for the forest like forest fire prevention, not cutting live trees, pack it in/out.

I don't agree with shutting the roads down. I agree with increasing Ranger numbers and making the road maintenance to be a state issue, not just APA and DEC, but township and county level.

For example: The case of MRP adding additional funds to Arietta and Morehouse seems silly. But the majority of the open or recently closed roads are in their townships, not Indian Lake or Webb (Inlet). Indian Lake and Webb economically benefit significantly from MRP road and has for a long time. However, seems like funds to DOT departments (townships) could be either

moved to IL/Webb or to Arietta/Morehouse. That particular road responsibility is a state issue, not just APA/DEC. It's a significant road to Indian lake and Webb/Inlet and why they help to maintain it.

In regards to Independence River, some of those DEC roads connect private withholdings to private withholdings. If that is the case, it's a township road. APA might have a say, but in my opinion it's definitely not 100% DEC road.

In my opinion, it's slightly questionable why DEC money has been used to maintain some of the roads in Independence River or MRP. The DEC has so many possibilities of land acquisition right now. They all have roads. Changing verbiage in road maintenance and liability from the DEC may alleviate some money to pay for additional Forest Rangers to patrol these new and existing areas.

There's options to keeping roads open like deeming them historical like in the case of Sagamore. Also the opportunity for a township to maintain the road vs. the DEC like the case of Jabe Pond road, which has improved greatly from Hague's maintenance of the road.

As the State buys more land the percentage of roads should go up equally and not held to a standard written fifty years ago. Possibly go back in time to make this sliding scale to be feasible.

What could be: The road to Boreas ponds has one of the greatest views of the high peaks in the ADKs. The road, as mentioned in Vanderwhacker Wild Forest UMP, gives access to old growth forest in the area. It should be open to the public. A: not everyone can afford going to Elk Lake for the view B: not everyone can physically hike or bike into the boreas ponds or the old growth stand up by boreas.

Hopefully, the options I've mentioned are considered.

- Transferring DEC liability/maintenance of roads to townships when they are economically beneficial to the townships.
- Increasing percentage of DEC roads as State ownership of land increases. Sliding scale vs. a decided percentage.
- Utilizing the historical aspects of certain roads to maintain their viability.
- Removing DEC jurisdiction when their roads connect interior (surrounded by state land) private withholdings to private withholdings. Turn them over to county/townships.
- What money saved by road closures or maintenance liability displacement

should go to increasing ADK-based Forest Rangers in order to maintain the trails that are open for hiking/horse riding/skiing and snowmobiling and performing their patrol duties on roads and trails.
- Roads are access for elderly and disabled (and the rest of the public) to go see and be in remote places safely.

Lastly, I'll conclude that it was made apparent that the cutting of new trails within the forest preserve is not constitutional. Closing roads limits accessibility, especially with recently acquired land by the state. These roads are it. The state can no longer buy land and clear/construct trails. Please keep this in mind during your decision process of Wild Forest roads and future land acquisition planning.

Thank you for your time.

Sincerely,
Matthew Kane

From: robertpatterson1952@gmail.com
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Wild Forest Roads
Date: Saturday, June 25, 2022 4:27:50 PM

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

I support maintaining and expanding roads within the wild forest to allow more people to enjoy the great outdoors. The majority of the Adirondacks are currently not easily accessible limiting use and enjoying the beauty that is there. With only a few hundred miles of active roads in wild forest areas environmental impact is not an issue to be concerned with. Roads are way less than 1% of the area.

Thank you, Bob Patterson – camp owner in the park and user of the park

Sent from Mail for Windows

From: Eric Keller
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Wild Forest basic guideline No. 4
Date: Sunday, June 12, 2022 6:24:21 PM

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

Hello,

My vote is Road Definition Alternative #2, NMI Alternative #2. I'd also be happy with RDA #2, NMIA #1. I'm in favor of as much road mileage as possible in the Wild Forests. These roads are the only way to get my young family and older parents out to remote areas. I'm a frequent visitor of Moose River Plains and Independence River Wild Forests. I would like the roads in these locations that have been closed over the years reopened. Especially Indian Lake Road, all the way to Indian Lake.

Thanks,
Eric Keller
20 Maple Ave.
Shortsville, NY 14548

From: Joseph Pustulka
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Wild forest road mileage
Date: Sunday, June 5, 2022 7:44:37 AM

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Things to consider in wild forest road milage ; at the very least should increase proportionately to when it was set up to the increase in land added to forever wild. Also a lot of things have changed since 1972. We have become more aware that accessibility for the handicap or physically unable to walk long distances or age has to be include. So some rd milage is necessary. The ADK is for everyone and those Rds should not be counted towards total. This is a necessity not an addition. Preserving the park with forever wild is a very good thing. But it should be acessable for everyone!!! Eg: ending the rd to the boreas pond a mile before the pond leaves out a large portion of our society to be able to enjoy . Roads necessary for this should not be counted in the over all set up.

From: Rich Cafiero
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Wild forest roads
Date: Monday, July 11, 2022 4:31:56 PM

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

To whom it may concern.

I am writing you as per the public comment section of statements before 7/12/2022 in regard to your notice concerning wild forest roads within the APA lands and any new lands purchased by the state in the future.

I have been an active visitor to the Adirondacks for 53years
Enjoying hunting, hiking and fishing, camping .

I have been a long time user of the Forest Preserve starting before their was an Adirondack Park Agency.

-NYS has an aging demographic for people using the outdoors, therefore expanding Wild Forest road access makes sense.

-there has been a huge increase in both Forest Preserve and easement lands since 1972…and allowable Wild Forest road mileage should reflect that increase.

I close with the fact that it doesn't seem right for the state to buy more land without creating a reasonable amount of equal access.

Yours truly

Richard Cafiero

223 Creamery Rd

Roxbury, NY 12474

From: Erik Frick
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Wednesday, July 20, 2022 11:54:43 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

Any interpretation of the SLMP's stipulation "there will not be any material increase in mileage of roads" must incorporate the SLMP's broader limitation of motorized use and preservation of the essentially wild character of Wild Forest lands. I do not believe that the proposed guidelines should be promulgated without a broader scope that defines and addresses other factors that affect not just the length, but the volume and impact of all motorized activity in Wild Forest areas.

I therefore make the following arguments in support of my position:

1) The ceiling of "no material increase" is not just about mileage, but all motorized uses and their effects upon the Wild Forest character. The APA's focus is better served by considering a reasonable interpretation of the meaning of "Wild Forest character" and using metrics that better measure it. In several places the SLMP speaks directly to the issue of appropriate locations for motorized use, with preference to travel corridors and borders of Wilderness and Wild Forest areas, avoiding motorized access to the heart of larger areas and thus preserving remoteness. This suggests that defining a metric to the evaluate remoteness would be as good a means—if not superior—to gauge the health of the Forest Preserve than the length of roads and snowmobile trails.

2) The APA's question #2 concerns the interpretation of the term "no material increase," and whether this guideline should be converted to a definable metric greater than, less than, or equal to 15%. These are all distressing possibilities to consider, because there is no statistically valid interpretation by which 15% would not be considered a material numeric increase. For instance, I would be ecstatic if my employer offered me a very significant 15% raise, and no doubt so would you. Any proposal that attempts to link the concept of "not material" to a 15% benchmark in any manner should be shelved as an unworkable concept that violates both the letter and spirit of the SLMP.

3) While I support Commissioners Policy #3 (CP3), which allows access by permit on DEC

administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Erik Frick
49 Watson Ave
Ossining, NY 10562

From: Nikolas Krasnove
To: SLMP_UMP_Comments@apa.ny.gov
Subject: No Material Increase Comments
Date: Sunday, August 7, 2022 11:27:28 AM

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

Dear Ms. Phillips,

Thank you for the opportunity to submit public comments on the Adirondack Park Agency's (APA's) interpretation of the Adirondack Park State Land Master Plan (SLMP) Wild Forest basic guideline No. 4, specifically addressing these questions:

1) What was the existing road mileage on lands classified as Wild Forest in 1972? What is the existing road mileage on lands classified as Wild Forest today?

2) What constitutes a material increase in road mileage?

3) Does CP-3 mileage meet the definition of a road in the SLMP and therefore require inclusion in the total Wild Forest road mileage calculation?

Any interpretation of the SLMP's stipulation "there will not be any material increase in mileage of roads" must incorporate the SLMP's broader limitation of motorized use and preservation of the essentially wild character of Wild Forest lands. I do not believe that the proposed guidelines should be promulgated without a broader scope that defines and addresses other factors that affect not just the length, but the volume and impact of all motorized activity in Wild Forest areas.

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1) The ceiling of "no material increase" is not just about mileage, but all motorized uses and their effects upon the Wild Forest character. The APA's focus is better served by considering a reasonable interpretation of the meaning of "Wild Forest character" and using metrics that better measure it. In several places the SLMP speaks directly to the issue of appropriate locations for motorized use, with preference to travel corridors and borders of Wilderness and Wild Forest areas, avoiding motorized access to the heart of larger areas and thus preserving remoteness. This suggests that defining a metric to the evaluate remoteness would be as good a means—if not superior—to gauge the health of the Forest Preserve than the length of roads and snowmobile trails.

2) The APA's question #2 concerns the interpretation of the term "no material increase," and whether this guideline should be converted to a definable metric greater than, less than, or equal to 15%. These are all distressing possibilities to consider, because there is no statistically valid interpretation by which 15% would not be considered a material numeric increase. For instance, I would be ecstatic if my employer offered me a very significant 15% raise, and no doubt so would you. Any proposal that attempts to link the concept of "not material" to a 15% benchmark in any manner should be shelved as an unworkable concept that violates both the letter and spirit of the SLMP.

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administrative roads for people with limited mobility, all Forest Preserve “ways” designated for motorized use must be tallied in any “no material increase” determination, regardless of their usage. Because the SLMP permits public motorized access only on designated roads and snowmobile trails, the APA lacks the authority to contemplate any other counting method. Wheeled motor vehicle access is impermissible on all Forest Preserve trails, therefore all CP3 routes must by definition be existing roads that are included in “no material increase” calculations. Indeed, all existing CP3 routes were selected precisely because they were roads with established administrative uses.

In conclusion, I welcome the APA's effort to clarify the SLMP's provisions regarding “no material increase,” but I strongly suggest that the Agency take this opportunity to return to its foundational mission, which is to be a regional planning agency, and focus instead on developing a robust policy on roads that is consistent with the letter and spirit of the SLMP.

Thank you for your attention to my thoughts, concerns, and ideas.

Signed,
Nikolas Krasnove
1 Amy Drive
Fort Edward, NY 12828

From: Taylor Huntley
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 19, 2022 10:46:35 AM

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

TO: The NYS Adirondack Park Agency

Dear Ms. Philips and the Adirondack Park Agency,

Thank you for considering the public's comments on the interpretation of the State Land Master Plan. On behalf of NOLS we are writing to ask that the APA consider an interpretation of the material increase to be no increase in roads in the Wild Forest areas of the Adirondacks as queried in question #2. As we believe that this will strengthen the sustainable outdoor recreation economy, as well as the other businesses and communities which rely on an intact landscape for their subsistence and livelihoods.

NOLS is a non-profit that strives to be the leading source and teacher of wilderness skills and leadership that serves people and the environment. The outdoor school was founded in Lander, Wyoming in 1965, and is known for taking students on multi-week, or even months-long, wilderness expeditions all around the world. From our humble beginning, NOLS has grown to employ over 1,200 employees and had an annual operating budget of ~$40 million, as of 2019. NOLS' Gabriels, New York location facilitated over 3,350 student user days in 2021 and has historically utilized the Wild Forests of the Adirondack Park as some of its key operating areas. Including previous and present use in Debar Mountain Wild Forest, Saranac Lakes Wild Forest, Taylor Pond Wild Forest and Wilmington Wild Forest.

NOLS' business model relies on being able to meet the expectations of our students by providing authentic wilderness experiences. Albeit, part of that student experience is to witness the intersection of various users, those with diverse abilities and means to access these landscapes that we travel through. However, the increase of roads through Wild Forest may permanently disrupt an acceptable balance of these multiple uses.

Further, it is important to fully account for the potential economic harm to outdoor recreation in terms of real dollars. NOLS employs several year-round Adirondack residents, and in 2022 will employ over 30 outdoor professionals. For developing future Park visitors, NOLS has created outdoor opportunities for over 210 students in 2019. These students learn Leave No Trace practices and can enjoy the beauty of the Adirondack wild spaces. These participants are mostly young adults and many are from marginalized populations. The presence and increase of roads throughout our operating areas can diminish skills that are learned. Skills such as off-trail navigation and route-finding, or risk management skills that serve students well beyond their NOLS course.

Lastly, it is important to recognize the potential loss of rich biodiverse, contiguous habitat which is known to function as a key carbon sink that actively helps to mitigate some of the negative effects of a warming planet.

Thank you for your careful consideration of our comments. Preventing additional roads in the Wild Forests that are not exclusively for the CP-3 mileage will allow businesses like our own to continue to thrive and help build toward a future where robust sustainable economies, intact viable ecosystems, and mitigating the harmful effects of climate change are key considerations in decision making surrounding the state's public lands.

Sincerely,

-Taylor Huntley

NOLS Northeast Program Manager

-Hannah Darrin

NOLS Public Policy Liaison

Sincerely,

Taylor Huntley <taylor_huntley@nols.edu>
730 State Route 86
Gabriels, NY 12939

From: Amylyn Roy
To: SLMP_UMP_Comments@apa.ny.gov
Subject: Public Comment on Adirondack Park State Land Master Plan-WF-BG No.4
Date: Tuesday, July 19, 2022 11:27:31 PM

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

TO: The NYS Adirondack Park Agency

Megan Phillips
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_UMP_Comments@apa.ny.gov

RE: Public Comment on Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4

Dear Megan Phillips, Adirondack Park Agency

Please accept these comments as part of the public hearing on the APA-DEC "interpretation" of Adirondack Park State Land Master Plan-Wild Forest Basic Guideline No.4.

1. The greatest negative impact to an intact forest system is the construction or maintenance of a road.

2. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all "administrative roads" as defined by the Adirondack Park State Land Master Plan.

3. An interpretation of APSLMP Wild Forest Basic Guideline No. 4. must include all roads open under the NYSDEC CP-3 policy.

4. APA-DEC needs to adopt a much smaller, and more reasonable, interpretation of “no material increase” than the 15% growth rate proposed. 15% is a substantial increase. A minor increase that complies with the "No Material Increase" requirement would be 2-3%.

5. APA should review the Wild Forest road mileage in the context of the 400+ miles of new public motor vehicle roads purchased by the State of New York in conservation easements in the Adirondack Park and the scores of miles of motor vehicle roads in Primitive, Canoe, Historic, Intensive Use, and State Administration areas in the Adirondack Forest Preserve. The State Land Master Plan must not be read narrowly, but should be read as its intended to take into account the full impact of all roads in the Forest Preserve.

6. By any reasonable standard, the APA-DEC have already exceeded the "no material increase" mileage cap in Wild Forest Basic Guideline No. 4. APA-DEC need to acknowledge that they have exceeded road mileage limitations set forth in Wild Forest Basic Guideline No. 4 and must adopt new measures to close roads in order to comply with the no material increase clause.

Thank you very much.

Sincerely,

Amylyn Roy <amylynlink1997420@gmail.com>
2 Riverview Terr
Rensselaer, NY 12144

Dear Megan Phillips,

How much development do you allow in the Adirondacks (including roads) before it takes, or dilutes the very thing that makes it the Adirondacks?

Wisdom is old men planting trees that they will never see grow!

Please have the wisdom to "NOT" increase road mileage in "wild forest" areas!

Thank you

Gerhardt Starsberg
10903 Depot Road
Remsen, NY 13438

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September 14, 2022

Chairman John Ernst
Adirondack Park Agency
P.O. Box 99
1133 state Route 86
Ray Brook, New York 12977

Dear Chairman Ernst,

Since 1972, the Adirondack Forest Preserve has grown by about 350,000 acres. More than 132,000 acres of lands classified as Wild Forest are among those additions, an increase of more than 11 percent since the ratification of the State Land Master Plan.

The Adirondack Forest Preserve continues to grow and so, too, should its interior road network.

We urge APA commissioners to take a narrow view of the "no material increase" provision within the State Land Master Plan pertaining to roads within Wild Forests. More specifically, it is our view that any limitation on road miles should be applied solely to lands that were under state ownership in 1972.

The new lands, those acquired since 1972 and classified as Wild Forest, are separate entities and should not be subject to a standard created when there were 132,000 fewer acres to consider.

Each new state acquisition has its own specific characteristics that should dictate the maintenance of existing roads or the construction of new ones. It is a task of which APA and DEC officials are more than capable of implementing as part of the Unit Master Plan process.

The roads running through the Wild Forests are assets, which serve DEC, emergency responders and the public alike. The application of an arbitrary standard would ultimately cost the state many of those very assets.

Respectfully,

Senator Daniel G. Stec
45th District

Assemblyman Matthew Simpson
114th District

Assemblyman Mark Walczyk
116th District