



The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK for current and future generations.

**BOARD OF DIRECTORS**

July 10, 2018

ROBERT J. KAFIN  
Chair

Terry Martino  
Executive Director  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977  
*(Via Electronic Submission)*

MICHAEL A. BETTMANN, M.D.  
Vice-Chair

SARAH C. HATFIELD  
Vice-Chair

DANIEL J. RYTERBAND  
Treasurer

**RE: July APA Board Meeting Agenda Items**

CHARLES D. CANHAM, Ph.D.  
Secretary

Dear Ms. Martino,

In reviewing the agenda for the upcoming July Adirondack Park Agency Board meeting, the Adirondack Council offers the following comments and suggestions.

EMILY M. BATESON  
JILL CHOATE BEIER  
DAVID E. BRONSTON  
LIZA COWAN  
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KATE RUSSELL  
DOUGLAS SCHULTZ  
LAUREL SKARBINSKI  
DOUGLAS STEWART  
CURTIS R. WELLING  
ETHAN WINTER

1. Approval of Project #2018-21/Herkimer County Emergency Services Tower: (Do not object) As we have noted on past tower proposals, the Council believes that the Agency's substantially invisible policy on telecommunications towers and other tall structures has been a model for the entire nation. After reviewing the project file, the Council does not object to the approval of the safety tower and believes the conditions of the permit address our concerns about the height and redundancy of the tower by citing the "public health, safety and welfare" guidelines within the Tower Policy as mitigating and exceptional circumstances.
2. Board Authorization to Proceed to Public Comment on APSLMP Conformance for the Mount Van Hoevenberg UMP Amendment: (Support going to conformance comment period) The Adirondack Council supports ORDA's overall efforts to modernize the facilities, increase energy efficiency and improve infrastructure reliability at the Van Hoevenberg venue, as long as the proposed improvements are legal and environmentally responsible. In comments submitted to the DEC on June 8, 2018 the Council addressed five topics within the draft UMP for consideration. We look forward to reviewing the proposed Final UMP to see how these issues were addressed and for conformance with the SLMP.
3. Board Adoption of Resolutions for the SLMP Conformance of the High Peaks Wilderness Complex UMP and Vanderwhacker Mountain Wild Forest UMP Amendments: (Oppose without significant changes) As record numbers of visitors to the Adirondacks indicate, the Park is seen as a world class destination that

**EXECUTIVE DIRECTOR**  
WILLIAM C. JANEWAY



DEFENDING THE EAST'S GREATEST WILDERNESS

preserves globally significant ecological habitats and offers outstanding recreational opportunities consistent with the legal requirement for preservation of the wild character of all Forest Preserve lands. We recognize and appreciate that so many visitors are drawn to the Park and view it as a national treasure. While there are significant challenges to managing this success, we see this as a challenge worth embracing.

In reviewing the High Peaks and Vanderwhacker UMPs, there are improvements worth noting, from acknowledgment of the wilderness best management principles, outlining a new wildland monitoring plan, integrating complex planning strategies across Forest Preserve units, and addressing long standing recreational needs for the rock and ice climbing community, among others. While we cheer these advancements, we note that in most regards the proposed Final UMP only made minor edits to the original drafts and failed to address many of the substantive issues raised through the public comment process. We believe that a number of those issues pose significant SLMP conformance issues and as such the Council opposes the adoption of these amendments unless significant changes are made.

As proposed, the High Peaks Wilderness and Vanderwhacker Mountain Wild Forest UMPs have multiple material deficiencies, fail to provide for adequate protection of natural resources and the wild character of the Adirondacks, and fall short of state master plan requirements. These deficiencies include among others: 1) the lack of any material analysis of the addition of 12.4 miles of new Forest Preserve roads that are being added as a component of the new state lands, even though snowmobile trail mileage is clearly addressed. The fact that APA and DEC propose to consider the Master Plan cap on Forest Preserve road miles after approval is wrong. 2) The SLMP clearly states that the carrying capacity for water bodies in the Forest Preserve must be evaluated, particularly for high value riparian areas such as the Boreas Ponds. The fact that proposed management actions are trying to meet these SLMP requirements as suggested on page 29 of response to public comment as “endeavoring to address the question of carrying capacity in Boreas Ponds” does not make the UMP amendments Master Plan compliant. 3) The Council strongly believes that a DEC declaration that these actions do not have the potential for a significant negative impact is wrong, and that the process of a joint comment period with the DEC undermined the public's full review and analysis of the UMPs. There are material deficiencies that need to be remedied before these UMPs should be presented as Final or an APA action finds them Master Plan compliant.

Given the timeline and expedited nature of these signature land management documents, the public is left with the impression that these documents are pre-determined and that regardless of the substantive issues raised, these plans were going to be finalized and approved with no significant changes. Given the amount of technical detail alone, and the number of comments submitted, there is an expectation that DEC staff would have made at least one material change to either of the UMPs (such as the entire addition of a section on rock and ice climbing) that would have resulted in a revised draft and additional public review.

As proposed the Council believes that substantive compliance issues exist. Further improvements are needed to address overuse and provide for improved, safer and sustainable access while prioritizing the protection of and preserving for current and future generations the ecological integrity and wild character of the Adirondacks.

4. Board Authorization to Proceed to Public Comment on APSLMP Conformance for the Travel Corridor Generic UMP: (Support going to conformance comment period) As we noted in our November 22, 2017 letter to the DOT, the Council believes the Generic Travel Corridor UMP provides a long awaited, solutions-oriented framework to guide future travel corridor unit management plans. The Council supports the draft document's clear, comprehensive and uniform framework, and provided DOT with a number of recommendations. The Park's proximity to 84 million people places the generic travel corridor UMP in a unique position to positively emphasize ecological integrity, address high traffic and parking densities, and numerous safety concerns in the Park. This is particularly relevant as we see increased use and visitor numbers over recent years along some of the most heavily used Adirondack travel corridors. We support moving this UMP to conformance review and plan to provide additional comments.

In closing, the Adirondack Council appreciates the complexity and wide variety of issues that regularly come before the Agency and appreciates the opportunity to provide these comments.

Respectfully,



Rocci Aguirre  
Conservation Director