

Sensible Change is needed in the State Land Master Plan: Proposals for Managing a Changing Adirondacks

The Adirondack Park Agency has launched a process to review and amend the State Land Master Plan – the document that governs the use of all 2,614,000 acres of state- owned land in the Adirondacks.

Together, members of the Adirondack Park Local Government Review Board, members of the Adirondack Associations of Towns and Villages and other leaders in the Adirondacks have reviewed the Plan and are pleased to present our recommendations for sensible updates that preserve the natural character and beauty of the Adirondacks while fostering economically sustainable communities for the people who live and visit here.

INTRODUCTION

In the 40 years since the creation of the Adirondack Park Agency and the State Land Master Plan, the economic and environmental forces that shape the Adirondack Park have changed dramatically.

The State Land Master Plan has not kept up, and sensible changes are needed to reflect the realities of today’s Adirondacks.

Change is uncomfortable – just ask the people who have been laid off since our national recession began in 2008. Change can be scary – like when an entrepreneur starts a business that she believes in but isn’t sure anyone else will. Change can be difficult – as it has been for those schools in the Adirondacks that have had to deal with budget shortfalls as residents flee to other areas, taking their students – and their tax money – with them.

And yet, without change, we wouldn’t have permeable pavement¹, upgraded and substantially invisible cellular phone towers², invasive species protection³, or permanent high-speed Internet service in areas of the Adirondacks.

Change is disrupting – but it is inevitable, and in this case is sorely needed. How we manage this change assures our success – or dooms us to failure. Some would have you believe that nothing can change in the Adirondacks – that any change the state makes in land use will take away from the “forever wild” character of the region.

Nothing could be further from the truth.

¹ “DEC to Move Forward With \$3 Million NY Works-Funded Porous Pavement Project for Reconstructing Lake George Road and Parking Lot,” New York State Department of Environmental Conservation

² “Adirondack Park Agency sees more cell tower upgrades,” Adirondack Daily Enterprise

³ “Lake George boat inspection program finds invasives on one boat in 10,” Times Union,

<http://www.timesunion.com/business/article/1-in-10-boats-launching-into-Lake-George-treated-5689411.php>

Sensible, properly managed change will preserve what works and will repair what doesn't work.

Sensible change⁴ for Adirondack residents means balancing the needs of our environment – which draws tens of thousands of visitors to our region each year – with the need to have economically strong communities that support our residents and provide services from rooms and retailers to rescue squads and police protection to those visitors.

It is sensible change that we are proposing.

UNIFYING THEME

Any meaningful change to the State Land Master Plan must begin with its “unifying theme,” which has been at odds with other key elements of Adirondack Park policy since its inception.

Currently, the second paragraph of the State Land Master Plan states:

"If there is a unifying theme to the master plan, it is that the protection and preservation of 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, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded."⁵

This declaration that the protection and preservation of the natural resources “must be paramount” is in stark contrast to the APA’s originating document – The Statement of Legislative Findings and Purposes in §801 of the Adirondack Park Agency Act. Enacted in 1971, before the creation of the State Land Master Plan, this document states (emphasis added):

“The basic purpose of this article is to insure optimum overall conservation, protection, preservation, development and use of the unique scenic, aesthetic, wildlife, recreational, open space, historic, ecological and natural resources of the Adirondack park.”

Gov. Nelson A. Rockefeller called for a “sensible balance” in 1973 upon his approval of the private land use and development plan. In his signing message, he wrote (emphasis added):

“This historic legislation, in striking a sensible balance between the needs for preservation and development within our treasured Adirondack Park, will assure

⁴ “Change in approach in Adirondack Park,” The Post-Star http://poststar.com/news/change-in-approach-in-adirondack-park/article_1e4f7d88-c34d-11e3-a26c-001a4bcf887a.html

⁵ Adirondack Park State Land Master Plan, Page 1

the use and development of the 3.7 million acres of private land within the Park proceeds in a manner consistent with the best interest of all people of the State.”

Our current governor, Andrew Cuomo, also understands and affirms the need for balance between environmental preservation and a strong economy. Speaking in September 2013, Gov. Cuomo said:

“Some don’t want the Park well-publicized, arguing that what is special is the isolation, that’s true. But it’s also true that the economy has to be sustained and you need tourism to sustain it. That’s the tension of the Park. Finding a balance is very important.”⁶

As recently as November 7, Gov. Cuomo again referred to supporting the need for sensible balance in the Adirondacks when his office announced \$500,000 in grants⁷ for communities in the Adirondacks to enhance business development and develop access for state residents – the owners of all of that state land – to the recently purchased lands formerly owned by Finch Paper of Glens Falls.

Prominent scientists are also advocating for a new approach and realizing the need for balance. Nature Conservancy scientist Peter Kareiva, Environmental Studies Professor Michelle Marvier of Santa Clara University and Robert Lalasz, Director of Science Communications for the Nature Conservancy, co-wrote that:

“...conservation cannot promise a return to pristine, pre-human landscapes. Humankind has already profoundly transformed the planet and will continue to do so. What conservation could promise instead is a new vision of a planet in which nature --forests, wetlands, diverse species, and other ancient ecosystems -- exists amid a wide variety of modern, human landscapes. For this to happen, conservationists will have to jettison their idealized notions of nature, parks, and wilderness -- ideas that have never been supported by good conservation science -- and forge a more optimistic, human- friendly vision.”⁸

In the Adirondacks, that human-friendly vision would go a long way toward building cooperative ties for future projects. The scientists conclude by saying conservation for its own sake isn’t working:

“None of this is to argue for eliminating nature reserves or no longer investing in their stewardship. But we need to acknowledge that a conservation that is only about fences, limits, and faraway places only a few can actually experience is a losing proposition. Protecting biodiversity for its own sake has not worked. Protecting nature that is dynamic and resilient, that is in our midst rather than far away, and that sustains human

⁶ “Exploring Adirondack Park with the Governor” Gotham Magazine September 2013

⁷ “Grants Awarded To Enhance Adirondack Tourism And Economy,” WAMC-FM, <http://wamc.org/post/grants-awarded-enhance-adirondack-tourism-and-economy>

⁸ “Conservation in the Anthropocene: Beyond Solitude and Fragility” The Breakthrough Journal, Winter 2012
<http://thebreakthrough.org/index.php/journal/past-issues/issue-2/conservation-in-the-anthropocene>

communities -- these are the ways forward now. Otherwise, conservation will fail, clinging to its old myths.”⁹

A human-friendly vision, or sensible balance, has not been the reality when it comes to state land use policy in the Adirondacks as evidenced by the troubling change in land ownership patterns over the past four decades.

In 1972, the public and private lands in the Park were apportioned as follows:

- 2,260,000 acres: state-owned land
- 1,495 acres: state-owned conservation easements
- 3,599,000 acres: private land

In 2014, the apportionment of land can only be called unbalanced¹⁰:

- 2,614,000 acres: state-owned land (a 15.66% increase)
- 778,000 acres: state-owned conservation easements (a 520% increase)
- 2,467,893 acres: private land without state conservation easements (a 31.44% decrease)

In just the last 16 years, the average annual rate of acquisition of public easements has exceeded 40,000 acres per year.¹¹

The reality of the Adirondacks in 2014 is that there are more acres of state-owned land and state-owned conservation easements than there are acres of private land without easements:

- In 1972, the number of acres of private land in the Adirondacks (3,599,398 acres) was 61.4 percent of the total 5,859,893 acres.
- In 2014, the number of acres of private land without state conservation easements in the Adirondacks (2,467,893 acres) is 42.1 percent of the total.

That loss represents nearly a third of the total acres of private land not subject to state conservation easements in the Park since 1972. To put that in other terms, the loss of private land in the Adirondacks over the past 42 years – basically two generations of New Yorkers – would be the equivalent percentage-wise of New York City (300,160 acres) losing Brooklyn (62,022 acres) and almost all of the Bronx (36,755 acres).¹²

⁹ Ibid.

¹⁰ Ibid.

¹¹ Adirondack Park Regional Assessment 2014, Page 3

¹² One square mile is 640 acres. New York City is 469 square miles, or 300,160 acres.

Given these disturbing trends, we believe it is time to incorporate the critical notion of sensible balance into the policy that governs state lands – something that was envisioned and called for in the days leading up to the creation of the APA, but that somehow was never translated into policy.

Some will say that these changing land ownership patterns haven't caused the economic hardships found in the Adirondacks today. But while the loss of 31.44% of private land not subject to restrictive state conservation easements may not be the sole cause, it is certainly one of the major contributing factors to the economic decline.

Our Recommendations:

We propose that the second paragraph of the State Land Master Plan be changed to reflect the need for sensible balance as follows:

If there is a unifying theme to the master plan, it is that the protection and preservation of the natural resources of the state lands must be undertaken in sensible balance with the needs of the park's permanent, seasonal and transient populations for growth and service areas, employment, and a strong economic base." We propose that the State Land Master Plan be updated to include the current land ownership apportionment in the Park (which can be found in the 2014 Adirondack Park Regional Assessment), and that the Plan should be automatically updated with each new state purchase (in fee or easement) to ensure that the reality of the current situation in the Adirondacks will always be reflected.

INVASIVE SPECIES PROTECTION

The tremendous recreational experiences provided by state-owned lands in the Adirondacks contribute greatly to the region's economic health by bringing recreationalists from across the state and country and around the world to our communities. But with this great influx of visitors comes the introduction of invasive species, unwittingly or uncaringly introduced into our lakes or forests from other locales. These destructive organisms threaten the long-term health of our natural resources and the economic benefits that flow from them, and the State Land Master Plan should be updated with measures to address these threats.

Our Recommendations:

- To ensure the Plan reflects the need to prevent the introduction of aquatic invasive species in the Adirondacks, we propose adding a provision in the Intensive Use section of the plan, on Page 39 under Boat Launching Sites, that calls on the state DEC to create stations at boat launching sites (or, alternately, at major Adirondack entry points) where boat inspections would be required and washing stations would be provided. This program would expand upon the highly successful effort begun on Lake

George in 2014, during which more than 19,000 craft were inspected and 1,200 boats were found to require decontamination before launch.

- To ensure the Plan reflects the need to control the introduction of terrestrial invasive species introduced via firewood and other sources, we propose adding a provision in the Wild Forest and Intensive Use sections of the Plan that requires DEC to develop detection and treatment programs for these pests. We further propose that state campgrounds establish inspection stations for carried-in firewood, and that penalties be imposed for importing wood beyond the 50-mile limitation.

SIGNAGE POLICIES

Locally owned small businesses – car repair garages and gas stations, general stores, pharmacies, restaurants, retail shops and hotels – are the mainstays of the Adirondack economy. They are scattered throughout the region, providing services on main roads, on side roads, and at the end of lightly traveled roads.

But if visitors don't know they are there, it is an opportunity lost for the visitor, the business, and for the municipality, which loses sales tax revenue.

Adirondack region businesses and visitors would benefit from amenity information being presented on well-designed but simple roadside signs created in a way that is compatible with the Adirondack landscape and aesthetic.

Our Recommendation:

We propose amending the Travel Corridors section of the State Land Master Plan (starting on page 46) to allow for establishment of a Business Directional Sign program. The program could be coordinated between the APA and the local government, and would allow standardized, moderate-sized signs to be placed on the Northway and other main travel corridors and state rights-of-way that would direct visitors to lodging, gas, food, local businesses, commercial services, tourist destinations and points of scenic, historic, religious, cultural and educational interest.

We are not proposing large and intrusive roadside “billboards,” but rather following the standard established by Vermont with its “Official Business Directional Signs.” These signs are placed along roads to serve the traveling public and indicate “the route and the distance to public accommodations, commercial services for the traveling public, and points of scenic, historic, cultural, educational and religious interest.”¹³

¹³ Vermont Statutes Online

SCENIC VISTAS

The authors of the State Land Master Plan provided for the creation of 37 scenic vistas¹⁴ along the Adirondack's 1,087 miles of Travel Corridors, yet visitors today can actually see less of the region's natural splendor than they could 40 years ago.

Why is that? Because vegetative growth at those scenic overlooks blocks the view. Visitors are literally unable to see the Wild Forests because of the wild trees and plants.

The section of the State Land Master Plan that deals with scenic vistas does not include any provision for them to be maintained over time – by trimming or removing the scene-blocking vegetative growth – to allow someone in 2014 to see what a visitor saw in 1972. This requires an easy fix and a sensible change.

Our Recommendation:

We propose that the Travel Corridors section of the State Land Master Plan (Page 48) be updated to allow the restoration and maintenance of these vistas (listed in the State Land Master Plan on page 117-118) by the state Department of Environmental Conservation or Town or Village Highway Departments through the trimming or cutting of vegetative growth that blocks the view from the vistas.

APPROPRIATE USES

In reviewing the land use permissions for the millions of acres of state property in the Adirondack Park, we find numerous opportunities to make sensible changes that would provide greater recreational interest and use on the part of visitors and residents alike while not endangering our natural resources.

Changing what activities are allowed on certain lands will draw more visitors (and residents) to use the land. They would also do business with local merchants and generate sales tax revenues for local governments. These improved economic benefits will result in stronger communities, with the resources to provide adequate visitor services and protect the resources that attracted people in the first place.

We are not promoting changes to Article XIV¹⁵. We are promoting sensible changes in land use regulations that make the areas more accessible, more usable, more livable and will allow families and businesses to thrive while preserving “forever wild.”

¹⁴ State Land Master Plan (February 2014), Page 117

¹⁵ Article XVI of the New York State Constitution: The “Forever Wild” section, <http://www.dec.ny.gov/lands/55849.html>

Our Recommendations:

Mountain Bikes

Residents and visitors often bring mountain bikes on their visits, which allow them to explore areas that might be too far for a hike – especially for families.

According to the Lake Placid Regional Office of Sustainable Tourism, cycling is one of the “largest draw” activities among outdoor interests of visitors to the Adirondack.¹⁶ The Times Union newspaper further reports that 1,191 mountain bike visitors came to the Whiteface Mountain Resort in the summer of 2013, bringing in about \$15,000 in revenue¹⁷.

As a reflection of that interest, the state Department of Environmental Conservation is currently re-opening the Wilmington Wild Forest’s Unit Management Plan to review what changes can be made in order to make Wilmington the “mountain bike capital” of the Adirondacks.¹⁸

That will help that area’s economy for sure – and may help to develop new small businesses related to bicycling. But there are many areas of the Adirondacks that can’t be accessed on mountain bikes.

Currently, mountain bikes are not allowed in areas designated as Wilderness, Primitive or Canoe. We believe that the Plan should be updated to allow bicyclists to use existing roads, horse trails, snowmobile trails and state truck trails in those areas where the infrastructure of the roads/trails exists to support it.

In Wilderness areas horse trails are permitted -- trails that were converted from abandoned roads, or are snowmobile trails or current or former state truck trails. There is no reason why cyclists could not use the same trails or paths to explore areas that are now deemed off-limits. Such an expansion would bring cyclists and their families to areas of the Adirondacks not now being frequented and would develop an attraction for cyclists – creating a tourism draw that the governor has pitched in the Adirondacks over¹⁹ and over²⁰ again.

We propose that the Plan be updated (Page 23) to allow all terrain (mountain) bicycles on these trails in Wilderness areas. The regulations for Primitive areas (Page 28) and for

¹⁶ Leisure Travel Study 2013, Regional Office of Sustainable Tourism, Lake Placid, NY <http://www.roostadk.com/wp-content/uploads/2014/08/Final-Leisure-Visitor-Study-2013.pdf>

¹⁷ Number of the Day, Times Union, <http://www.timesunion.com/default/article/Number-Of-The-Day-5902328.php>

¹⁸ “Wilmington as the Adirondack Park’s mountain bike capital (Editorial)” Lake Placid News, http://www.lakeplacidnews.com/page/content_detail/id/522454/Wilmington-as-the-Adirondack-Park-s-mountain-bike-capital.html

¹⁹ “Revving up Tourism” Adirondack Daily Enterprise

²⁰ “Gov. Cuomo announces discount at state campgrounds,” Watertown Daily Times

Canoe areas (Page 30) are based on the Wilderness regulations, and therefore would also be changed as proposed.

Cross-country Skiing

Most cross-country skiers prefer trails that offer quiet reflection, challenging terrain and are groomed. That limits the number of places skiers can frequent in the Adirondacks, as grooming on cross-country trails is only allowed in areas designated Intensive Use.

We propose that grooming of cross-country ski trails also be allowed in Wild Forest areas, opening up many more acres for this passive wintertime use. The Plan itself notes that many of the Wild Forest areas are under-used, and states that, “Because the resources of these areas can withstand more human impact, these areas should accommodate much of the future use of the Adirondack forest preserve.”²¹

This proposal also fits into the Plan’s basic guidelines for Wild Forest, which call on the state to “provide the types of outdoor recreation that will afford public enjoyment without impairing the Wild Forest atmosphere.”²² Adirondack communities will never be able to compete with other areas of the state for cross-country skiers without this sensible change in the Plan.

Low-impact Ski Touring

We support the call by the Adirondack Powder Skier Association to update the Wilderness and Wild Forest sections of the Plan to allow the creation each winter of low-impact ski touring trails.

The Association, a not-for-profit corporation formed to study, protect, promote and enhance low-impact human-powered snow sports on the public lands of the Adirondacks, has been meeting with APA and DEC to develop standards for the creation of ski touring trails – essentially transient ski trails that follow natural terrain features and contours under mature trees on public lands that would require minimal maintenance and reasonable access.

We believe that the organization’s low-impact activity is perfectly suited for both areas, as the trails would not be significant improvements on the land, but would allow access – by agreement of the APA and DEC – to the hardest skiers who define eco-tourism.

²¹ State Land Master Plan, Page 31

²² Ibid.

Snowmobiling

In many Adirondack communities, snowmobilers represent the ONLY winter tourism dollars being spent at our restaurants, gas stations and other accommodations, and thus they are critical to the survival of our communities.

A few years ago, in a masterful work of cooperation, the state and local governments and environmental organizations negotiated a series of changes to snowmobile regulations²³ that made the activity safer and more environmentally friendly for residents and visitors alike.

The new rules provide for: Class II Community Connector Trails with a nine-foot maximum trail width (these trails were re-routed from the interior to the outskirts of the forest preserve); Class 1 Secondary Trails with an eight-foot maximum width – (these trails are connected to more interior areas and preserve a more traditional type of Adirondack snowmobile experience); and tracked groomers to keep the trails maintained.

Unhappily, those widely approved sensible changes are not reflected in the State Land Master Plan, which specifically defines snowmobile trails in the Adirondacks as having "essentially the same character as a foot trail."

While "essentially the same character as a foot trail" might have made sense with the smaller snowmobiles of 1972, for safety's sake – and because we now use mechanical groomers on the trails – it does not make sense to keep that definition in 2014.

Snowmobile trails can certainly exist and be maintained on top of some hiking (foot) trails, as the Plan suggests. Generally, however, today's modern snowmobiles need wider paths, deeper snow pack and wider turns than what would be expected of a foot trail – and what would have been the norm with the snowmobiles of 1972. Additionally, the snowmobile regulations define the trail widths as eight-foot maximum on Class 1 Trails and nine-foot maximum on Class II trails (with wider rules for curves and steep running slopes).²⁴ That doesn't sound like a foot trail.

There is a definition already in the Plan that better reflects what would be expected of a trail needed for a snowmobile: a horse trail. We propose changing the language in the definitions (on Page 18) and throughout so that the updated Plan defines snowmobile trails as having essentially the same character as a horse trail, not a foot trail.

Sustaining Sporting Access

Hunting, fishing and trapping have been economic mainstays for Adirondack communities for decades. In New York State alone, a national survey showed that hunting and fishing

²³ APA/DEC Memorandum of Understanding: Management guidance: Snowmobile Trail Siting, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park http://www.apa.ny.gov/State_Land/Appendix_E.pdf

²⁴ Ibid.

contribute \$8.1 billion in economic activity²⁵ annually, and generate \$290 million a year in state and local taxes. Sportsmen and women in New York contribute \$67 million annually to conservation and fish and wildlife restoration, including paying for 247 professional staff within the state Department of Environmental Conservation.

In the last 40 years, access to land tracts that make hunting, fishing and trapping possible has been restricted through current Plan classifications, even though the primary purpose of these lands before being purchased by the state was for sustainable forestry coupled with hunting fishing and trapping.

When state land is being classified in the future, these current uses need to be accommodated in order to preserve this income for our counties and to draw sportsmen and women. Wild Forest corridors in Wilderness and Primitive areas that provide access to hunting areas and lakes and streams for fishing and trapping should be considered when classifying new tracts of land and accommodated.

OTHER SENSIBLE CHANGES

In addition to the preceding recommendations, we offer the following:

On Page 5, we propose that the language in the Plan that discusses New York Constitutional amendments that refer to the Adirondacks include the latest New York Constitutional Amendments approved in 2013 on the Township 40 Settlement (Proposition 4) and the Adirondack Land Swap (Proposition 5).

On Page 7, in the section titled “Acquisition Policy Recommendations,” we propose that the Plan include a list of forestlands that were generally agreed to be productive forestlands that the state has acquired since the adoption of the SLMP in 1972 and remove the word “normally” from paragraph 1.

On Page 11, at the end of the Unit Management Plan section, we propose adding a list of UMPs adopted to date and those remaining to be adopted with target dates updated from the 1989/90 target dates currently referenced in the section.

On Page 15, we propose a constitutional amendment be enacted – which is suggested in the SLMP but was never followed through – to classify the state administrative areas, highways, utilities and historic use areas in the Adirondacks as non-forest preserve land uses beyond any question, and further, as is also suggested in the Plan, developing a modest “land bank” that would permit future acquisitions of economically developable land.

²⁵ “Governor Cuomo Unveils “NY Open for Fishing and Hunting” with Plan to Reduce Cost of Hunting and Fishing License” February 2013, <http://www.governor.ny.gov/news/governor-cuomo-unveils-ny-open-fishing-and-hunting-plan-reduce-cost-hunting-and-fishing>

On Page 15, we propose adding the term “administrative personnel” to the list of definitions and broadening the traditional meaning to include municipal employees and members of snowmobile clubs authorized by DEC to groom snowmobile trails, as well as the standard understanding of agency and state employees.

On Page 20 Page 33 and Page 43, we propose that the description of bridges be changed to allow new bridges to be constructed of stronger, lower-profile steel materials to allow it to span longer distances and be less obtrusive visually. New bridges are currently required to be constructed of natural materials. Long-span bridges that use steel, such as the existing bridge at Whitehouse on the Northville-Placid Trail, have a lower profile than a natural material bridge and therefore are less likely to stand out in the wilderness as manmade.

On Page 32, in the Wild Forest section, we propose updating Section 4 under basic guidelines to reflect the recent agreements on snowmobiles (noted above) as well as the current mileage of snowmobile trails, which has not been updated since 1972 when Governor Rockefeller stated in his press release approving the State Land Master Plan that there were 930 miles of snowmobile trails then in existence and 20 miles lost in wilderness classification would be replaced in other classifications.

On Page 33, in conjunction with the definition addition above, we propose adding language that clarifies that administrative personnel referenced in the section that describes appropriate use of motor vehicles that personnel who are allowed to use motorized vehicles include municipal employees and members of snowmobile clubs authorized by DEC to groom snowmobile trails.

On Page 42, we propose adding the Santanoni, St. Regis Mountain and Hurricane Mountain Fire Tower historic areas to the section of the Plan discussing Historic Areas. We further propose adding a provision that requires an inventory of the remaining historic sites in the Adirondacks – one of the least-used yet most important land classifications – and which requires that a report on the findings be delivered to the people of the state of New York within a year of the adoption of the measure.

On Page 49, we propose updating the Plan (under Roadside aesthetics, section 4) to authorize the state Department of Transportation to install guiderails that are necessary to maximize safety, rather than requiring the weak post cable system or self-oxidizing rails throughout the Adirondacks as is currently required.

On Page 123, in Appendix II, we propose bringing the list of state held conservation easements up to date, including acreage, and adding the year that each easement was purchased by the state.

As a final note: When Lows Lake in St. Lawrence County was closed to float planes; it left few popular lakes where float planes are allowed to land. At that time, the state Department of Environmental Conservation promised to designate additional areas in the

Adirondacks for float plane usage. That designation has not yet happened and we call on the DEC and APA to do so.

CONCLUSION

The Adirondack Park Local Government Review Board and the Adirondack Association of Towns and Villages believe the sensible changes outlined in this document will help foster stronger, more vibrant communities while continuing to protect our natural resources.

Most of all, we believe that by working together with the Adirondack Park Agency, the state Department of Environmental Conservation, recreational user groups and the local environmental groups, we can protect, preserve and develop the Adirondacks for the next hundred years.

Thank you for the opportunity to provide these comments. Please do not hesitate to contact us if you have any questions about our recommendations.