



Board of Directors

March 9, 2016

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NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

James McMartin Long
Secretary

RE: APA should make no amendments to the Adirondack Park State Land Master Plan for Primitive Areas

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Dear Chairwoman Ulrich,

The Adirondack Park Agency (APA) is poised to make significant changes to the Adirondack Park State Land Master Plan, which will erode State management and protections for the Forest Preserve. These actions mark the first time in APA history that the APSLMP will be amended to weaken and not strengthen protections. The APA should not make any changes to Primitive Areas.

Peter Bauer
Executive Director

Ruinous Precedent for Wilderness: What distinguishes the Adirondack Forest Preserve from protected wildland systems in other places is the classification of Wilderness. The Programmatic Environmental Impact Statement, which governs APSLMP revision, states that Wilderness is the cornerstone of the Forest Preserve and that the defining principle of Forest Preserve management is the expansion of Wilderness in the Adirondack Forest Preserve. The APA is doing the opposite.

The amendment that the APA is poised to approve fundamentally changes Primitive areas and will have far-reaching negative consequences for Wilderness lands in the Forest Preserve. This vote is a vote to weaken Wilderness.

Data-Free Policy Making: The APA is moving ahead with allowing bicycle use and motorized management in the Essex Chain Lakes-Pine Lake Primitive areas despite flimsy analysis in the Supplemental Environmental Impact Statement. The

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APA has stalwartly refused to assess public desires for bicycle riding on dirt roads in the Forest Preserve compared with specially designed single-track bicycle trail networks. The APA's refusal to undertake this analysis is unfortunate.

Important public policy matters should not be made in data-free zones. Good science leads to good public policy. Bad decisions are made when no data is available or sought. The APA should reject the SEIS as an inadequate basis of analysis to make an informed decision.

Erratic Classification Begets Illegal UMP Begets Ruinous APSLMP Amendment: The seeds for this setback and ruinous precedent for the APSLMP germinated in the December 2013 classification of the Essex Chain Lakes and Pine Lake Primitive areas. The hallmark of this classification was a spot zoning gerrymander for a Wild Forest corridor. This spot zoning led to approval of illegal bridges over the Hudson and Cedar Rivers and the destruction of thousands of trees in the Vanderwhacker Mountain Wild Forest area from the construction of a redundant and unnecessary snowmobile trail.

Those who negotiated this gerrymander outside the APA, which was then dutifully ratified by the APA, set in motion the APA's current decision to weaken the APSLMP. In the history of the APA, there has never been such a series of bad choices, based on legal fictions and a steadfast refusal to analyze potential natural resource impacts, from the 2013 classification, the 2015 Unit Management Plan, and the 2016 APSLMP amendment.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to provide our views on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer
Executive Director