



Board of Directors

August 11, 2017

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RE: Public Comment on Saranac Lakes Wild Forest Area Draft Unit Management Plan

James McMartin Long
Secretary

Protect the Adirondacks congratulates the Department of Environmental Conservation on its preparation and release for public comment of the new draft Saranac Lakes Wild Forest Area Draft Unit Management Plan (SLWFUMP). This plan has been a long-time coming. PROTECT staff participated in a citizens advisory group for this UMP more than ten years ago. This Wild Forest area contains a number of challenging issues to balance natural resource protection and public recreational use. We support a number of proposals by the DEC detailed in this UMP and encourage that others issues be reviewed and revisions made.

David Quinn
Treasurer

The SLWFUMP is one of the best UMPs developed to date, but it suffers from the institutional limitations of the DEC with regards to Forest Preserve management, unrealistic planning given the Cuomo Administration's failure to adequately invest in and maintain the Forest Preserve, dishonest statements about the analysis that the DEC undertakes to make informed management decisions, and it fails to comply with a series of requirements in the Adirondack Park State Land Master Plan (APSLMP).

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Protect the Adirondacks submits the comments below as part of the DEC public hearing on this UMP and ask that the DEC make responses in its "Response" document that will be included with a final plan submitted to the Adirondack Park Agency.

Peter Bauer
Executive Director

Baseline Data: The fisheries data provided are thorough and informative. It represents a compilation of an extensive body of work by DEC staff. The extensive information and planning for reclamations show that fisheries management is a priority for the DEC.

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By contrast the public use data had significant gaps. How is it that an entire year of data for some of the most popular and heavily used areas can go missing? Data is missing for Brewster Point and Connery Pond trails for 2010 and 2011. Further, there is no data for 2012-2016. The UMP does not appear to have current information for boat launches as nearly half of the data on Table 8 “Amount of Use at Selected Boat Launches” is missing. What does it say about the DEC and its priorities that half of the trail registration data in Table 8 is missing?

When the DEC is finalizing a draft UMP, it should be a priority to gather public use data from all areas within the unit for at least the prior year, if not longer. That will give the DEC and the public some current information on which to evaluate public use and make decisions.

While we appreciate the inclusion of “state land tax payment” data in this UMP it would be helpful to have more current data than 2009.

The UMP states that ATV trespass is a problem (pages 72-73) and that illegal use is causing damage on the Forest Preserve. Unfortunately, the UMP fails to identify where it is a problem, the extent of the damage caused, or what the DEC plans to do to curb these violations.

Capacity to Withstand Use: The section “Capacity to Withstand Use” contains a robust discussion of about leading theories of public lands and wildlands management and practices. The DEC states that it blends established practices of (1) the goal-achievement process; (2) the Limits of Acceptable Change (LAC) model employed by the U.S. Forest Service; and (3) the Visitor Experience and Resource Protection (VERP) model employed by the National Park Service. DEC states that there are “clear benefits offered by employing a blend of these approaches.”

This is a bold management proclamation by the DEC for a comprehensive approach to Forest Preserve management. Unfortunately, Protect the Adirondacks sees very little evidence that the DEC actually does any of this.

The UMP states that the “goal-achievement process provides a framework for proposed management by means of the careful, stepwise development of key objectives and actions that serve to prescribe the Wild Forest conditions (goals) outlined by APSLMP guidelines. The Department is mandated by law to devise and employ practices that will attain these goals.” In essence, the DEC states that the Adirondack Park State Land Master Plan requires this, so it is already happening.

The APSLMP enumerates the requirements for the development of a UMP on pages 10–12. A review of these requirements shows that the DEC has failed to meet at least a quarter of them:

First, the APSLMP requires “an inventory, at a level of detail appropriate to the area, of the natural, scenic, cultural, fish and wildlife (including game and nongame species) and other appropriate resources of the area and an analysis of the area’s ecosystems.” (p 10). The DEC has satisfied this requirement in the draft SLWFUMP.

Second, the APSLMP requires “an inventory of all existing facilities for public or administrative use.” (p 11). The DEC has satisfied this requirement in the draft SLWFUMP.

Third, the APSLMP requires “an inventory of the types and extent of actual and projected public use of the area.” (p 11) The DEC has failed to satisfy this requirement in the draft SLWFUMP. The public use data in Table 7 is 27 years old. The public use data in Table 8 is incomplete as nearly all the data is “NA.” The trail register data in Table 5 ends in 2011 and the data for the two most popular trails is incomplete. The data in Table 14 is incomplete. In essence, the DEC has failed to track historic use accurately and effectively. The DEC does no better when projecting future use.

Fourth, the APSLMP requires “an assessment of the impact of actual and projected public use on the resources, ecosystems and public enjoyment of the area with particular attention to portions of the area threatened by overuse.” (p. 11) The DEC has failed to meet this requirement across the unit in the draft SLWFUMP, though it has identified overuse as a factor, along with APSLMP compliance, with campsite closure.

Fifth, the APSLMP requires “an assessment of the physical, biological and social carrying capacity of the area with particular attention to portions of the area threatened by overuse in light of its resource limitations and its classification under the master plan.” (p 11) The DEC has satisfied this requirement in the draft SLWFUMP insofar as it proposes a number of significant changes to close and relocate campsites.

Sixth, the APSLMP requires “Each unit management plan will also set forth a statement of the management objectives for the protection and rehabilitation of the area’s resources and ecosystems and for public use of the area consistent with its carrying capacity.” (p. 11) The DEC has failed to meet this requirement in the draft SLWFUMP. For instance, the DEC cites problems with ATV damage, but has no proposal for remediation of the damaged areas.

Seventh, the APSLMP requires “These management objectives will address, on a site-specific basis as may be pertinent to the area, such issues as ...”

–“Actions to minimize adverse impacts on the resources of the area.” (p 11) The DEC has partially satisfied this requirement but has failed to provide a full list of areas that require remediation.

–“The rehabilitation of such portions of the area as may suffer from overuse or resource degradation.” (p 11) With regards to primitive campsites and lean-tos, the DEC has satisfied this requirement. With regards to ATV damage, the DEC has not satisfied this requirement.

–“The regulation or limitation of public use such that the carrying capacity of the area is not exceeded and the types of measures necessary to achieve that objective.” (p 11) The DEC has failed to meet this requirement in the draft SLWFUMP. For instance, on page 146 the SLWFUMP states “A carrying capacity assessment will be conducted to guide future management and ensure that limits are not exceeded for use of the unit’s waters. A focus of this assessment

will be the area of the Saranac Lake Islands Campground (Lower and Middle Saranac lakes as well as Weller Pond).” If the analysis has not been completed, then the DEC has not satisfied this requirement.

–“The preservation of aquatic and terrestrial habitats of the area.” (p 11) This DEC has failed to satisfy this requirement in the draft SLWFUMP due to its failure to fully detail the extent of natural resource damage and overuse in many areas and the failure to identify areas with ATV damage.

–“The preservation and management of the fish and wildlife resources (including game and non-game species) of the area.” (p 11) This DEC has satisfied this requirement in the draft SLWFUMP.

–“The preservation and management of the lakes, ponds, rivers and streams of the area, with particular attention to all proposed or designated wild, scenic and recreational rivers.” (p 11) This DEC has satisfied this requirement in the draft SLWFUMP.

–“The preservation and management of special interest areas such as the habitats of rare, threatened or endangered species and areas with the potential for the reintroduction of extirpated species, unique geological areas and historic areas or structures.” (p 11) This DEC has satisfied this requirement in the draft SLWFUMP.

–“The identification of needed additions or improvements to, and plans for providing for further appropriate public use of, the area consistent with its carrying capacity.” (p 11) This DEC has failed to satisfy this requirement in the draft SLWFUMP.

–“The removal of such non-conforming uses as may remain.” (p 11) This DEC has satisfied this requirement in the draft SLWFUMP.

–“The identification, in intensive use, historic and appropriate portions of wild forest areas accessible by motor vehicles, of measures that can be taken to improve access to and enjoyment of these lands, and associated structures and improvements, by persons with disabilities.” (p 11) This DEC has satisfied this requirement in the draft SLWFUMP.

Eighth, the APSLMP requires “the Unit management plans will also address the administrative actions and the minimum facilities necessary on a site-specific basis, as may be pertinent to the area to attain the stated management objectives of such area.” (p 11) This DEC has satisfied this requirement in the draft SLWFUMP.

Ninth, the APSLMP requires “Schedules for achievement of such objectives will be included in each unit management plan. The land characteristics and the recommended objectives for each area will be related to and integrated with the characteristics and management objectives for adjacent public and private land areas. General recommendations for future acquisition will be included as appropriate.” (p 12) This DEC has satisfied this requirement in the draft SLWFUMP.

Tenth, the APSLMP requires “An initial draft of the unit management plan for each state land area including alternative management objectives, where appropriate, will be submitted to the Agency for review and comment, prior to the preparation of the final draft plan for public review.” (p 12) This DEC has satisfied this requirement in the draft SLWFUMP, though in some areas, such as motorboat use on the Saranac Lakes Chain, the alternatives are written in such a way as there is only one viable choice. An alternative not listed is to manage the Saranac Lake Chain in a way where some sections are motorless and others are not. Here, South Creek and the Weller Ponds could be managed as motorless areas.

Eleventh, the APSLMP requires “Opportunity will be made for review and comment on the draft unit management plans by the public and other interested parties, and a public meeting or meetings will be convened as appropriate for that purpose.” (p 12) This DEC has satisfied this requirement in the draft SLWFUMP.

Twelfth, the APSLMP requires “Final unit management plans will be prepared by the Department of Environmental Conservation after due consideration of all comments and recommendations made on the public review draft. The Commissioner of the Department of Environmental Conservation will adopt each final unit management plan which will then be filed with the Agency. The Department of Environmental Conservation will report annually to the Agency on progress made toward the implementation of each adopted unit management plan.” (p 12) It is unclear at this time whether this requirement will be satisfied. PROTECT notes that significant comments on draft UMPs often go without a response from the DEC or that official responses do not deal with the substance of the comment.

The DEC states matter-of-factly that its compliance with the UMP development guidelines in the APSLMP fulfills and illustrates its implementation of the “goal-achievement process.” A review of the specific requirements enumerated in the APSLMP for the development of a UMP above shows that the DEC has failed in the SLWFUMP to satisfy at least at least a quarter of these requirements. Given the failure to fully comply with this section of the APSLMP, we do not find that the DEC has met its objectives in the “goal-achievement process.”

The second “established practice” of the blend of approaches that the DEC uses to assess the capacity of the resource to withstand use is the “Limits of Acceptable Change (LAC) model employed by the U.S. Forest Service.” On page 169, the DEC states that it will “develop and implement” an LAC program as one alternative for the campsites on Saranac Lake islands.

The DEC has not actually undertaken and implemented an LAC process to gather the necessary data and perform the necessary analysis as part of the development of the SLWFUMP and its proposed management actions. An LAC analysis would be very useful to understanding the challenges associated with a variety of management decisions and developing better management alternatives.

The third “established practice” of the blend of approaches that the DEC uses to assess the capacity of the resource to withstand use is the “Visitor Experience and Resource Protection (VERP) model employed by the National Park Service.” On page 69, the SLWFUMP states

with regards to LAC and VERP that “Establishing and maintaining acceptable conditions depends on well-crafted management objectives which are explicit and draw on managerial experience, research, inventory data, assessments and projections, public input, and common sense.” We see no evidence in this UMP that “inventory data, assessments and projections, public input” were utilized in developing the management recommendations. Rather, the SLWFUMP relies heavily on the “managerial experience” of the DEC staff.

The SLWFUMP provides more information on the LAC/VERP practices and DEC implementation. The UMP states:

In outline, the Department’s approach applies four factors in identifying potential management actions for an area:

- The identification of acceptable conditions as defined by measurable indicators;
- An analysis of the relationship between existing conditions and those desired;
- Determinations of the necessary management actions needed to achieve desired conditions;
- A monitoring program to see if objectives are being met.

A proposed list of management and planning concepts, for which measurable indicators and monitoring tools can be developed, may be used by the Department for measuring and evaluating acceptable change on the SLWF as follows:

- Condition of vegetation in camping areas and riparian areas near lakes and streams;
- Extent of soil erosion on trails and at campsites;
- Noncompliant visitor behavior;
- Noise on trails and in adjacent campsites;
- Conflicts between different user groups;
- Diversity and distribution of plant and animal species;
- Air and water quality.

The SLWFUMP fails to undertake many of the analyses or management actions detailed above. If the DEC actually did any of the analysis it professes to use in this 3-part “blend” of management practices it would be a credible program, but the DEC strains credulity by stating that it does the work described above.

This is simply not an honest accounting to the public of how the DEC manages the public Forest Preserve.

Make Weller Pond and Little Weller Pond Motorless: Weller Pond, and Little Weller Pond, should be a motorless, quiet waters area that should be made off-limits to motorized watercraft, only accessible by non-motorized vessels. These ponds should be managed as a quiet and beautiful respite among the heavily used and extremely popular Saranac Lakes Chain.

The decision to make the Weller Ponds a motorless area should be made as part of the new Saranac Lakes Wild Forest Area Unit Management Plan, which the state released earlier this summer. While the state wants to maintain the status quo on Weller Pond, many public comments were submitted urging motorless management.

There are many reasons why the Weller Ponds should be a new motorless area:

1. The Weller Ponds could be a motorless refuge on the heavily used and motorized Saranac Lakes Chain.
2. It would be easy to do. The State of New York owns the entire shoreline areas around both Weller Pond and Little Weller Pond. The state owns the lands around the navigable channel that connects these ponds to Middle Saranac Lake. The state has the authority to close these ponds to motorized boat traffic; it simply needs the will to do so.
3. When we look across the Saranac Lakes Chain, from Lake Flower to the Saranac River to Upper Saranac Lake, the area totals over 9,000 acres of open waters. Weller Pond and Little Weller Pond are just 190 acres – just 2% of the waters of the Saranac Lakes Chain. Why can't we set aside 2% of these waters as a motorless area?
4. Across the Adirondacks there are relatively few opportunities for motorless waters on large lakes and ponds. It's important to note that most of the major lakes are open to all manner of motorized watercraft. A report published by Protect the Adirondacks in 2013 "The Myth of Quiet, Motor-free Waters in the Adirondack Park" found that of the 100 largest lakes in the Adirondacks, from Lake Champlain to Beaver Lake (in Watson and Webb in western Adirondacks), 77 are open for all manner of motorized boating and floatplanes, 14 lakes are privately owned and provide no public access, and just 8 are motor-free. Boreas Ponds, which was recently purchased by the State of New York for addition to the Forest Preserve, and is number 95 among the Park's biggest lakes at 338.9 acres, and it's currently being reviewed for management and classification by state agencies and may be added to the motorless list. Of the eight motor-free lakes among the Park's top 100, just five are relatively easy to access and motor-free. Just 17 of the biggest 200 lakes are easily accessible and motor-free. The demand is high for motor-free experiences, but the supply is low. The public deserves greater opportunities for motor-free waters across the Adirondack Park.
5. The administration of a motorless Weller Pond is manageable because there is only one entrance point – the 1,000-foot channel from Middle Saranac Lake. A sign stating that no motorboats are allowed could be placed at the entrance to the channel and a short distance into the channel. The DEC campsite reservation system could be changed to state that the lean-to and three campsites on Weller Pond are available only for motorized watercraft. DEC could also advertise the motorless state on its website.

Wild places grow fewer each year. The Adirondack Park offers great opportunities for hiking in wild places, where the longer one hikes the more remote the country one can access, but

opportunities to do this by boat are limited. For many, canoe or kayak access is how they get to wild places and enjoy Wilderness. Greater opportunities are needed for motorless waters in the Adirondacks and Weller Pond is one such opportunity that must be seized.

South Creek Canoe Access: The South Creek boat launch area should be managed only for non-motorized watercraft. The site should be permanently gated to prevent the launching of motorized watercraft. South Creek should also be managed as a motorless waterway.

Carry to Lake Clear: We support the new canoe carries from Lake Clear to connect to the St. Regis Chain and the St. Regis Canoe area.

Campsite Closure, Relocation and Compliance: The best part, and most ambitious part, of the SLWFUMP is its proposal to close and relocate scores on campsites throughout the unit in an effort to address over-use and to comply with APSLMP campsite separation distance requirements. This constitutes a major effort by the DEC and will be one of the largest remediation efforts ever undertaken on the Forest Preserve.

PROTECT supports the plans by the DEC for campsite closure and relocation.

Floodwood Road Campsites: PROTECT supports efforts to close existing non-APSLMP-compliant campsites on the Floodwood Road. This is long overdue.

Boat Launches: The SLWF area contains four boat launches for trailered boats (motorboats) on Lake Placid, Raquette River, Upper Saranac Lake and Lake Flower. The major boat launch on Lower Saranac Lake is classified as Intensive Use, but is basically part of this unit and the boats launched there are used on the water bodies in the SLWF area.

In addition to these five major boat launches where large motorboats can be launched there are a number of launch sites where trailered boats cannot be launched and are primarily used for canoes and kayaks, though some allow for boats and small motors to be launched. These launches need to be secured to prevent illegal launching of trailered boats. PROTECT questions why some of these waterbodies need a 15 HP engine and encourages the DEC to look at limiting use to electric trolling motors, similar to those used on Thirteenth Lake as part of the Siamese Ponds Wilderness Area UMP.

New Trails: We support the proposals for new foot trails in this unit, which total over 36.6 miles. Over 34 miles of these trails are either designed as new mountain bikes systems or will be open to mountain bikes. While we are generally supportive of new mountainbiking trail networks we urge the DEC to seek out opportunities for trails that are foot trails for walking without having to compete other uses.

Proposed Trailless Area: PROTECT supports the 7,400-acre trailless area. A motorless and trailless core should be a goal within every Wild Forest area and UMP.

Interpretive Trails: PROTECT supports the DEC proposal for a new interpretive trail on the

east side of Lake Clear and upgrades to the two existing interpretive trails. Every Wild Forest area should have an interpretive trail.

Class II Community Connector Snowmobile Trail Construction Violates the Adirondack Park State Land Master Plan and Article XIV, Section 1 of the State Constitution: The SLWFUMP proposes 2.18 miles of new class II community connector snowmobile trails. The APSLMP defines a snowmobile trail as “a marked trail of essentially the same character as a foot trail” and mandates that it be “compatible with the wild forest character of an area.” A snowmobile trail “should be designed and located in a manner than will not adversely affect adjoining private landowners or the wild forest atmosphere....” Class II community connector snowmobile trails are 9-12 feet in width and are road-like and simply do not have the character of a foot trail, which violates both the wild forest character and the wild forest atmosphere of the area. PROTECT has consistently stated that class II community connector snowmobile trails do not conform to these three standards.

A class II community connector snowmobile trail’s surface has been graded, leveled, and flattened by a multi-ton excavator. Extensive bench cuts are dug into side slopes that parallel the trail for long distances, protruding rocks are removed, extensive tree cutting is done, all understory vegetation is removed, and oversized bridges are built to support multi-ton groomers. In places bedrock may be fractured and chipped or gravel may be used to stabilize the trail surface. Bridges have been outfitted with plastic reflectors for nighttime driving.

A “foot trail” is where people walk single file. They step over roots and rocks. The trail surface is uneven and follows the terrain. There are scarcely any stumps of cut trees. Vegetation on the side often encroaches, and the trail is canopy covered. Steppingstones and split logs are commonly used to pass over streams and wet areas. There are no reflectors.

PROTECT has identified that there are many other areas of the APSLMP for Wild Forest areas that are expressly violated by the design and construction of class II community connector snowmobile trails and by grooming with large tracked (motor vehicle) groomers. These include:

1. Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft 6) states that public access accommodations should be “consistent with the wild forest character.”

PROTECT does not believe that the new road-like class II community connector class II snowmobile trails are consistent with the wild forest character. The route’s width, bridges, reflectors, bench cuts, ledge cuts, use of gravel and straw, extensive surface alteration, tree removal, understory removal are all inconsistent with the “wild forest character” of Wild Forest areas.

2. Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft #8) states “All conforming structures and improvements will be designed and located so as to blend with the surrounding environment and require only minimal maintenance.” PROTECT does not believe that the new class II community connector snowmobile trails meet the minimal maintenance test expressed here. DEC and the APA claim that the grooming of this trail is maintenance. PROTECT does not believe that numerous trips per week by a multi-ton tracked groomer on a

major snowmobile route meets the “minimal maintenance” test.

3. Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft 9) states “All management and administrative actions and interior facilities in wild forest areas will be designed to emphasize the self-sufficiency of the user to assume a high degree of responsibility for environmentally sound use of such areas for his or her own health, safety and welfare.”

Leaving aside concerns of snowmobile “environmentally sound use” with their mileage rates less than most SUVs, PROTECT questions the “self-sufficiency” of the users of class II community connector snowmobile trails where the principal recreational use of snowmobiling can only be accomplished if the trail has been regularly groomed by a multi-ton tracked groomer.

Class II Community Connector Snowmobile Trails Violate the State Constitution: Class II community connector snowmobile trails are designed and built for snowmobiles to travel 25 miles per hour or higher and be groomed with large tracked groomers. No other recreational “trail” use sees this kind of speed. No other trail system in the Forest Preserve requires 9-11 foot wide trails, specifically designed and constructed to allow regular grooming with large multi-ton motor vehicles and high-speed snowmobile travel. Unlike other trails built by hand, these trails are excavated with heavy machinery, utilize extensive bench cutting, remove thousands of trees over 3 inches diameter at breast height (DBH), remove tens of thousands of trees under 3 inches DBH, remove the entire native understory, often replace the native understory with a grass mix, open the forest canopy, often fracture and chip away bed-rock, utilize oversized bridges often equipped with reflectors, and are built to handle operation of motor vehicles. No other recreational activity in the Forest Preserve, outside of Intensive Use Areas, requires such profound terrain alteration and destruction of natural resources.

PROTECT believes that this network of class II community connector snowmobile trails violates Article XIV, Section 1 of the NYS Constitution.

Ampersand Mountain Trailhead Parking: The parking area for Ampersand Mountain and lake access needs to be improved. There should be a recommendation to examine an amendment to the High Peaks Wilderness UMP for siting and building a new parking lot on the east side of Route 3 in the High Peaks Wilderness.

ATVs: The SLWFUMP states that illegal ATV use is a problem in the unit, but fails to identify where or to detail the damage caused to natural resources of facilities. The UMP also fails to address how this illegal use will be stopped in the future.

CP-3 Access: While there are no CP-3 motorized routes in the SLWFUMP, we note that there are three specially designed fishing access areas for disabled individuals. We also note that since so much of the major water bodies on the Saranac Lake Chain, and other major lakes, are accessible by motorboat, that access is also provided for disabled individuals. More important is that a number of trails will be made accessible for disabled access.

Ownership of the Averyville Road Extension: There is also a road which is of uncertain

legal status (as to whether it is a town road or not). This road is known as Kelly or Pine Pond Road or an extension of Averyville Road. It runs along the border between the SLWF and the High Peaks Wilderness. This road is in the towns of North Elba and Harrietstown. The legality of this use has not been proven or disproven. The road is used to reach private property along Oseetah Lake and by the public for recreational uses, such as access for hunting, snowmobiling, and mountain biking. Right now this road facilitates trespassing on the Forest Preserve for illegal ATV and motor vehicle use.

Saranac Inn Golf Course Trespass on the Forest Preserve: Another issue that is unresolved in the SLWFUMP is the trespass on the Forest Preserve of the Saranac Inn golf course. This should be resolved. This UMP contains a section “Recommendations for corrections for Land Classification Errors.” This section should include a statement about Forest Preserve lands currently being maintained and used as private golf course lands. This issue grows even more serious as there is speculation that these lands could be developed for housing.

Mountainbiking: PROTECT supports the DEC’s proposals to build new mountainbike trails.

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

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