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July 19, 2013

Mr. James Connolly
NYSAPA
PO Box 99
Ray Brook, NY 12977

RECEIVED
JUL 19 2013
ADIRONDACK PARK AGENCY

RE: Comments on Forest Preserve Classification for the Essex Chain Lakes, Hudson River, Hudson Gorge Primitive Area, and Blue Mountain and Vanderwhacker Mountain Wild Forest Areas from Protect the Adirondacks

Dear Mr. Connolly,

There are many reasons why Wilderness Alternative 1A is the right choice for the Adirondack Park Agency (APA) during the classification public hearings for the newly acquired Finch Paper lands, the Hudson River Gorge Primitive Area, and parts of the Blue Mountain and Vanderwhacker Mountain Wild Forest areas. Simply put, a Wilderness classification provides the best natural resources protection and the best long-term recreational access. Wilderness Alternative 1A is the choice for Wilderness with access.

We live in a world where opportunities for Wilderness experiences and for places to exist in wilderness settings grow fewer each day. It may not seem like it in the Adirondack Park, a place where we have successfully allowed some big places to either remain as wild places or, even more importantly, to become wild places, but as a society, and as a state, we need more wilderness areas not fewer.

Newly Purchased Finch Paper Lands in a Park-Wide Context

The classification of the Finch Paper lands in question need to be placed into context with overall Adirondack Park land protection efforts as well as proposals by the Department of Environmental Conservation (DEC) for management of the roughly 65,000 acres of former Finch Paper lands purchased and in the process or being purchased for the Forest Preserve. The APA should consider this information.

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More Wild Forest than Wilderness: Today across the Adirondack Forest Preserve there is approximately 1,184,179 acres of Wilderness and Primitive lands in the Forest Preserve. This compares with 1,293,721 acres of Wild Forest.

Disposition of Finch Paper Lands: The Nature Conservancy purchased roughly 165,000 acres of the former Finch Paper lands. In 2010, over 90,000 acres were protected as conservation easements, roughly 60% of the total land holdings. The principal public recreational benefit on these easement lands was the creation of permanent snowmobile trails that connect the Town of Newcomb with the Towns Indian Lake and Long Lake.

DEC Proposals Heavily Focused on Wild Forest for Finch Paper Lands: The proposal from the DEC for classification of the 65,000 acres of former Finch Paper lands to be purchased for the Forest Preserve is heavily tilted towards Wild Forest. The majority of lands along the Golf Brook Road and along the Hudson River north of Route 28N are recommended for Wild Forest. The large tracts in Fulton and Saratoga counties will be Wild Forest.

State Land Acquisition Based Heavily Conservation Easement: For the past 25 years, land acquisition by the State of New York has been heavily – more than 80% – purchase of conservation easements. These provide public motorized access opportunities with few non-motorized or primitive camping opportunities. A relatively small portion of the total Forest Preserve lands purchased has ended up classified as Wilderness.

When one looks at the classification decision in a Park-wide context, it's clear to see that state policy has been to create opportunities for permanent motorized access, with scant opportunities for Wilderness.

For a variety of reasons Wilderness classification in Alternative 1A is the best decision for the long-term public enjoyment and natural resource protection of these lands.

Wilderness Classification Consistent with the State Land Master Plan

Many false claims have been made that the newly purchased Finch Paper lands do not possess the characteristics for a Wilderness classification and somehow do not meet the Adirondack Park State Land Master Plan (SLMP) requirements. The APA Act requires that Forest Preserve lands be classified "according to their characteristics and ability to withstand use." (p14)

In its "Classification" guidance section, the SLMP recognizes the physical characteristics of different Forest Preserve lands. The SLMP make special note of

"fragile areas" that includes "low lying areas such as swamps, marshes and other wetlands. In addition rivers, streams, lake and ponds and their environs often present special physical problems." (p14) Clearly, the Essex Chain Lakes, Hudson River, and Cedar River area abundant in water.

Wildlife concerns are also important. The SLMP states "In addition, wildlife values and wildlife habitats are relevant to the characteristics of the land and sometimes determine whether a particular kind of human use should be encouraged or prohibited, for examples ... the problems associated with motorized access to bodies of water with wild strains in native trout." (p 14) Clearly, the sensitive lake trout fishery is an important determinant for a Wilderness classification.

The "Wilderness Area" definition in SLMP also provides guidance. An integral part of the Wilderness definition is the concept of restoration. "A wilderness area is further defined to mean an area of state land or water having a primeval character, with significant improvement or permanent human habitation, which is protected and managed so as to preserve, enhance and restore, where necessary, its natural conditions."

Note the words "enhance and restore, where necessary." This was written in the SLMP in recognition that there are lands that due to its recent land use history may have some characteristics, such as roads, borrow pits, culverts, etc., at the time of public purchase that Wilderness areas generally do not have. But, over time as natural processes are allowed to occur unhampered and with minimal (only atmospheric) impacts by people, these minor land use conditions will be reclaimed by the regenerating forest.

Further, when we look at the Wilderness definition in the SLMP it lays out four distinct criteria for Wilderness. The Essex Chain Lakes area right now, even with the various vestiges of its 150-year industrial managed forest past, meets these other SLMP Wilderness definition criteria:

1. The first part of the definition is that the lands "Generally appear to have been affected by the forces of nature, with the imprint of man's work substantially unnoticeable." The Essex Chain Lakes area meets this test for three reasons.

- First, despite the recent land use past as an industrial managed forest that some argue disqualifies the Essex Chain Lakes as Wilderness, if one looks out from the waters of the Essex Chain Lakes today you will largely see a shoreline of mature trees and hillsides of full forest canopy. If one looks from the Hudson River corridor you largely see the same.

- Second, the recent land use history was that the Essex Chain Lakes was managed as industrial forestland and for hunting and fishing camps. These are human activities that over a relatively short amount of time the forest will reclaim. This was not a Tahawus Mine site. This was not a cluster of 1000 condos. This was not a sprawling residential area. This was not a downtown hamlet zone. This was a large industrial managed forest with a road system and some hunting camps.

  Yes, there are roads that crisscross the forest, stumps are highly evident, and shelterwood clearcuts and patch clearcuts are evident as well. But these remnants of the land's industrial managed forest past will recede over time. Roads will be closed, bridges will be removed, hunting camps will be torn down and the sites will regrow or be converted to campsites, clearcuts will regrow.

- Third, in this transition where the forest is allowed to regrow, the Essex Chain Lakes is exactly like other areas that have been designated as Wilderness and today grow wilder each year. The most pertinent recent precedent examples are: The William C. Whitney Wilderness area where the Little Tupper Lake tract has roads and sites of removed hunting camps, yet was classified as Wilderness. The Round Lake Wilderness has roads and sites of removed hunting camps and a dam, yet was classified as Wilderness. The Middle Branch of the Oswegatchie River basin in the Five Ponds Wilderness also has roads and sites of former hunting camps. All of these recently classified Wilderness Areas grow wilder each day.

The Essex Chain Lakes area and Hudson River Gorge are bulls-eye matches for the other three criteria in the SLMP Wilderness definition.

2. The SLMP Wilderness definition states: "Has outstanding opportunities for solitude or a primitive and unconfined type of recreation." The Essex Chain Lakes and Hudson River Gorge meets this test.

3. The SLMP Wilderness definition states: "Has at least 10,000 acres or contiguous land and water." The Essex Chain Lakes and Hudson River Gorge meets this test. Under Alternative 1A is part of a larger, contiguous, and coherent wilderness area of 38,500 acres.

4. "May also contain ecological, geological or other features of scientific, educational, scenic or historical value." The Essex Chain Lakes and Hudson River Gorge meets this test. Two features dominate. First, the Essex Chain Lakes is a rare series of linked lakes and ponds. We don't have many such places in the Adirondack Park.

Second, the ability to protect 22 miles of the state's grandest river in a Wilderness is of high public value and benefit.

For all of the reasons stated above, the Wilderness 1A alternative clearly meets the standards and qualifications of the SLMP for a Wilderness classification.

Natural Resource Protection

A Wilderness classification provides the best management for keeping wild areas intact. Natural resource protection is the paramount responsibility under the SLMP.

Invasive Species Protection: The biggest threat facing the future aquatic health of the Essex Chain Lakes is infestation of aquatic invasive species. One only has to look at the tragedy of Lake Durant, a Forest Preserve lake in the Town of Indian Lake. The only motorboat access is a state launch at the Lake Durant campground. An infestation of variableleaf milfoil emanates widely from the launch across the south end of the lake. There is no community effort, as on lakes with associations, to combat this infestation and the lake is overrun. If a Forest Preserve lake is infested by aquatic invasive species, it is almost impossible to control.

A wilderness classification that prohibits motorboats and floatplanes is the best protection against aquatic invasive species.

Protection of Sensitive Lake Trout Fishery on Essex Chain Lakes: Management of the Essex Chain Lakes as a motor-free area accessed by canoes, guide-boats, and kayaks will protect the sensitive lake trout fishery. Motorboat access will lead to over-fishing and introduction of non-native species.

A wilderness classification that prohibits motorboats and floatplanes is the best protection for the lake trout fishery.

Few Motorless Opportunities on Big Lakes in the Forest Preserve

The Adirondack Park is held up as the great wilderness area in the eastern United States. It's the place where people come for a wilderness experience and to enjoy the great outdoors. Indeed, the Park contains well over 85% of the officially-designated state or federal Wilderness lands from the mid-Atlantic states to Maine.

One great myth about the wild Adirondack Park is that there is an abundance of motor-free lakes and ponds. In fact, the Park faces a scarcity of quiet waters where one can paddle a canoe or kayak without interruption from motorboats, jet skis, floatplanes, and other types of motorized watercraft.

Of the 200 largest lakes and ponds in the Adirondack Park, from Lake Champlain, with 262,864 acres, to Round Pond in Indian Lake, covering 134.9 acres, the overwhelming majority of big lakes and ponds provide abundant opportunities for motorized watercraft—but scant opportunity for quiet, motor-free waters. Protect the Adirondacks documented this data in a new report *The Myth of Quiet, Motor-free Waters in the Adirondack Park* and a copy is enclosed for the hearing record.

Among those 200 largest lakes, 114 are open for motorboating, 55 are private with no public access, 29 are motor-free, and public use on 2 others is in the process of being determined, including Third Lake on the Essex Chain Lakes. 11 of the 29 motor-free lakes are largely inaccessible and involve a lengthy hike carrying one's boat.

If we look at the acreage of the 100 largest lakes in the Adirondack Park, 96% are in waters open for motor boating. Only 2% are in motor-free waters, and some of these can be reached only by long hikes carrying one's boat. These numbers shatter the myth of motor-free waters in the Adirondack Park. The perception among public officials and state policymakers is that the Adirondack Park is tilted too far towards non-motorized recreational pursuits. The reality is far from this when it comes to motor-free waters open and easily accessible for the general public.

PROTECT believes that the largest lakes in the Adirondack Park provide the most accessible opportunities for public water-based recreation. But the supply of motor-free experiences on these waterbodies is low when compared to the abundance of opportunities for motorized watercraft. There needs to be greater equity for motor-free waters recreation so that the Adirondack Park can better meet the public's demand for a wide spectrum of outdoor recreational opportunities. There is a great demand for recreational experiences on accessible, motor-free lakes and ponds. The demand is high, but the supply is low.

Two lakes in the Adirondack Park's Top 200 are soon to be classified by the APA: Third Lake (Number 94, 340 acres) and Boreas Pond (Number 95, 338 acres). PROTECT supports Wilderness classification for these two remote lakes. This would help to correct the imbalance of waters available for all types of motorized watercraft and motor-free waters.

Wilderness Alternative 1A provides public access that preserves the experience for all. A wilderness experience will be the same each visit, not dictated or disrupted by motor vehicles. Alternative 1A seeks to classify the Essex Chain Lakes as a new area like Lows Lake or Lake Lila or Little Tupper Lake. We need more motor-free opportunities on big lakes across the Adirondack Park. There are few such wild places in the Park today and we should not miss the opportunity to create a new one

SLMP Requirement for "No Material Increase" in Forest Preserve Roads

PROTECT remains very concerned about the stated determination the Department of Environmental Conservation (DEC) and APA to ignore the SLMP requirement that forbids a "material increase" in the mileage of roads managed in the Forest Preserve. This is highly pertinent to the classification of the former Finch Paper lands. The SLMP, which the courts have held has the force of law, requires that there shall be "no material increase" in the mileage of roads in the Forest Preserve since 1972.

As you will recall a substantial effort was made by the APA and DEC to determine the mileage of snowmobile trails in the Forest Preserve as part of the Adirondack Park Snowmobile Plan. This was important to meet the SLMP requirement for "no material increase" in snowmobile trail mileage. The same holds true for "roads."

It is our experience from working with the DEC during the protracted *Galusha* lawsuit settlement and Pataki-era Snowmobile Focus Group that much of the necessary information has been organized to determine the mileage of roads in the Forest Preserve. Moreover, the great majority of Wild Forest Unit Management Plans (UMPs) have been completed (17 completed, 2 in draft, 4 unknown status). These UMPs all include road mileage data. Last, the State of New York maintains an excellent dataset of all roads, improved and not improved. Many roads in the Forest Preserve are included. From all this disparate data, Adirondack GIS experts that PROTECT has consulted do not see the job of closely estimating the total mileage of roads in the Forest Preserve in 1972 and today as a difficult task.

It's clear from the classification recommendations from the DEC to the APA that the Finch Paper lands could be the single greatest addition of roads to the Forest Preserve, possibly bigger than the Moose River Plains or Watson's East Triangle acquisitions.

The APA must ensure with each classification and approved UMP that there is no material increase in the mileage of roads in the Forest Preserve. It would be illegal for the APA to approve new Wild Forest lands during classification review, where roads will be proposed for ongoing maintenance and management in subsequent UMP approval, without making a finding about compliance with the SLMP's no material increase clause in Wild Forest Basic Guideline Number 4.

In short, PROTECT does not believe that a Wild Forest classification is possible due to the extensive mileage of roads that exist in these areas, and the extensive mileage of roads the DEC desires to keep open in other parts of the Finch Paper lands, such as the Golf Brook Road.

State Land Master Plan requirement for "no material increase" in the mileage of roads in the Forest Preserve: The SLMP states in Wild Forest Basic Guideline Number 1 "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." This is the clear policy directive against which all recreational activities in Wild Forest areas must be evaluated.

On the question of roads (and snowmobile trails), Basic Guideline Number 1 is refined in Basic Guideline Number 4: "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 uses by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972."

Clearly, the SLMP requires that all new lands classified as Wild Forest that contain new roads must be evaluated for compliance with Basic Guideline Number 4.

New acquisitions since 1972 classified as Wild Forest: A comparison of the first APA Land Use and Development Plan Map from the Rockefeller era with the most current map (2009) finds notable Wild Forest acquisitions in the Watson's East Triangle Wild Forest, Debar Mountain Wild Forest, and Saranac Lakes Wild Forest. Of these three areas only the Watson's East Triangle Wild Forest has an approved Unit Management Plan (UMP). This UMP approved over 13 miles of roads to be managed in the unit, all new since 1972.

Existing data sources for the mileage of roads in wild forest areas of the Adirondack Forest Preserve: The DEC has stated that it cannot manage the task of canvassing the Forest Preserve to determine the mileage of existing roads. PROTECT believes that it is critical that the APA and DEC complete this analysis prior to acting on classification of the Finch lands. Without this analysis, the APA will not be able to make the legally required finding that the proposed classification complies with the SLMP.

There are a number of data sets that will readily yield both the current mileage of roads in the Forest Preserve and the mileage in 1972.

1. Existing Wild Forest Area UMPs (17 completed, 2 in draft, 4 unknown status)

In recent years, the DEC and APA have completed a number of UMPs. Each UMP includes an inventory of existing roads that are open to the public. Completed UMPs include Aldrich Pond Wild Forest, Black River Wild Forest, Blue Mountain Wild Forest, Bog River Complex Wild Forest, Cranberry Lake Wild Forest, Fulton Chain Wild Forest, Hammond Pond Wild Forest, Independence River Wild Forest, Jessup

River Wild Forest, Moose River Plains Wild Forest, Shaker Mountain Wild Forest, Split Rock Wild Forest, Taylor Pond Wild Forest, Vanderwhacker Mountain Wild Forest, Watson's East Triangle Wild Forest, White Hill Wild Forest, and Wilmington Wild Forest. These 17 UMPs all include road inventories with mileage.

Much work has been on six other Wild Forest area UMPs: Chazy Highlands Wild Forest, Debar Mountain Wild Forest, Ferris Lake Wild Forest, Grasse River Wild Forest, Lake George Wild Forest, Saranac Lakes Wild Forest. Formal drafts have been released for Ferris Lake and Lake George units. It may be that road mileage information is available at this time for the other four.

2. 2006 Adirondack Park Snowmobile Plan Estimates

In 2006, the DEC finalized the *Snowmobile Plan for the Adirondack Park* containing an estimate of the mileage of snowmobile trails on the Forest Preserve. It stated 170.12 miles of "roads" in the Forest Preserve were included in the snowmobile trail mileage estimate (page 42; see attached). So, as recently as 2006, DEC mapped at least 170.12 miles of roads. This is an excellent starting point for an analysis.

3. Legal Actions

As part of earlier legal actions mentioned above (*Galusha* and *Bear Pond Road*) PROTECT has identified other sources of data. Attachment D "Sources of Roads Mileage Estimates in the Adirondack Park" of the *Galusha* settlement states that 216.4 miles was the "mutually agreed to" by the APA and DEC as mileage for Forest Preserve roads in 1972 (see attached). There were also over 50 miles of roads in dispute. At that time, DEC Region 6 provided an estimate of 139.95 miles of roads in its region; Region 5 did not provide a mileage estimate.

4. State of New York Roads Inventory

The State of New York manages an excellent statewide roads database. Many Forest Preserve roads are included in this system. While some checking will be necessary unit by unit to verify these roads, this is not a major obstacle.

The SLMP requires that there be "no material increase in the mileage" of roads in the Forest Preserve over the 1972 level. The APA must ensure with each classification and approved UMP that this does not happen. It would be illegal for the APA to approve new Wild Forest lands during classification review, where roads will be proposed for ongoing maintenance and management in subsequent UMP approval, without making a finding about compliance with the SLMP's no material increase clause in Wild Forest Basic Guideline Number 4.

Motorized Access will Lead to ATV Abuse

Protect the Adirondacks is very concerned about efforts underway by local governments and motorized access supporters to open new areas of the "forever wild" Forest Preserve to use by All Terrain Vehicles (ATVs). In our view, this would be a grave mistake because of the enormous damage to natural resources that ATVs inflict and the longstanding failure of the DEC to control illegal ATV use on the Forest Preserve. PROTECT believes that ATV riding is an intensive and abusive recreational activity that should be relegated to private parks, such as the sport of motocross racing, and on industrial forestlands where the state has purchased conservation easements, which have an adequate maintained road network.

In PROTECT's view use of ATVs on the Forest Preserve was an experiment that failed. Public ATV use was allowed in the 1990s on the Forest Preserve in the Adirondack Park and widespread ecological damage was the result. The damage was so great in some areas that DEC has never even attempted rehabilitation and restoration. In 2003, the Adirondack Park Agency (APA) and DEC closed scores of roads and trails in the Forest Preserve that had been illegally opened for ATV use.

PROTECT has enclosed *Thrillcraft: The Environmental Consequences of Motorized Recreation*, which showcases numerous failures around the U.S. to control abusive motorized uses on public lands. At the time *Thrillcraft* was published in 2007, the Adirondack Park was seen as the country's sole success story for protecting public lands from the ravages of motorized access based on its 2003 actions to close scores of roads on the Forest Preserve illegally opened to ATVs. Sadly, it appears that New York is no longer to be upheld as a success story.

ATV Use on the Adirondack Forest Preserve was an Experiment that Failed: In the 1990s, ATV use on the Forest Preserve was allowed. This was not done through a centralized plan or policy, but rather through disparate regional actions. No policy assessment had been done and certainly no environmental impact assessment was completed. As a result scores of roads and trails were illegally opened in the Forest Preserve for public ATV use.

In 2003, a special report was published about the ecological damage caused by ATV use entitled *Rutted and Ruined: ATV Damage on the Adirondack Forest Preserve* (see enclosed). This report catalogued ATV abuse of roads, trails and natural resources on the Forest Preserve, but also showed the way that ATV riders use public lands that is different from other recreational uses. These findings included the following observations.

1. ATV use destroys road and trail surfaces and Forest Preserve facilities, such as bridges, and cause soil and wetlands damage in ways that other motor vehicles do not.
2. ATV use creates deep ruts and mud pits on roads and trails that become impassable. It seems that ATVs are often ridden for the backwoods riding experience where one can make the mud fly and tear up an area. This damage makes a road difficult to travel for all other users.
3. Roads and trails are widened by ATV users to avoid a damaged, impassable area, which causes further damage to the corridor's natural resources and wild character.
4. The wild forest character and the Forest Preserve experience are damaged by ATV use. Non-motor vehicle users that use the roads and trails damaged by ATVs find their Forest Preserve experience diminished as the roads are unattractive, deeply rutted, widened, and mud-filled swamps.
5. ATVs regularly leave designated roads to illegally blaze new trails through the Forest Preserve. ATV bushwhacking off roads is very destructive.
6. ATVs regularly trespass around gates and boulders that are erected to control motor vehicle traffic. ATVs can blaze trails through the forest to circumvent barriers in ways that other motor vehicles cannot.
7. ATVs regularly drive through streams, creeks and wetlands for sport rather than use bridges that provide motor vehicles with access over a stream, creek or wetland.
8. ATVs regularly trespass on snowmobile trails, designated roads that prohibit ATV use, and footpaths that intersect with roads. In short, ATV operators often go where they want.
9. ATV use has led to vandalism of Forest Preserve facilities, such as gates that control access.

These impacts are particular to ATVs. ATV damage remains widespread across the Forest Preserve due to illegal trespasses. In many Wild Forest units illegal trespassing by ATVs is widespread and continues unabated.

ATV use damages natural areas. These machines are designed and built to punish wild areas. The sport of ATV riding is suited only to private parks or industrial forest lands with an extensive engineered road system. ATV use is a specialized, intensive activity analogous to motocross racing and downhill skiing where specifically created facilities are required to support this sport.

Alternative 1A is Wilderness with Access

Wilderness Alternative 1A provides a wide array of public access.

Road Access: Road access into parts of the Alternative 1A area is provided from the Wild Forest border area to the north near the Goodnow Flow to parts of the Chain Lakes Road.

Disabled Access: Alternative 1A provides CP-3 access to certified individuals. Qualifying individuals and their parties will be allowed to access the Essex Chain Lakes by motor vehicle and stay at a specially designed disabled campsite.

Hiking and Canoe Access: Under the Alternative 1A plan, people will be able to access the Essex Chain from a road parking area. This will be a "Lake Lila" type of access. This will provide access for many people of all ages and physical capabilities.

Floatplane Access: Floatplane access has been permanently provided to First Lake and Pine Lake on the edge of this new wilderness complex. Floatplane access is not needed for the interior of the Essex Chain Lakes and will change the atmosphere of the whole area.

Wilderness is a Management Policy, not a Land Condition Prerequisite for Classification

Some seek to denigrate this decision by saying that we're manufacturing wilderness and that these lands are not natural old growth forests, and, hence, they are not worthy of wilderness classification.

First, manufacturing wilderness is a great domestic activity. There should be a lot more of it.

Second, it's important to note that wilderness is a management policy where future management of land is different than past management of land. Wilderness is a policy that says in the future these lands will be managed in a way that lets natural processes occur with the absolute minimal interference from people.

Third, under a Wilderness classification these lands will grow wilder each year.

State Must Classify Waters as Well as Land

I attach a letter from attorney John Caffry on behalf of Protect the Adirondacks and Adirondack Mountain Club, the successful plaintiffs in legal action against the APA and DEC over the classification of Lows Lake. John Caffry states in this letter "As you may recall, the court in that case ruled that the Adirondack Park Agency Act and Adirondack Park State Land Master Plan require that the state must classify all lands in the Adirondack Forest Preserve pursuant to the APSLMP, including waters and

land under water, and that it must do so regardless of whether or not the state owns the entire bed or shoreline of the water body."

Wilderness Alternative 1A is the right choice for the Essex Chain Lakes, the right choice for 22 miles of he Hudson River, the right choice for Cedar Mountain and the Cedar River. It's the right choice Adirondack communities and the State of New York.

On behalf of the Board of Director of Protect the Adirondacks, please accept my gratitude for the opportunity to submit our comments on this important issue.

Sincerely,

Peter Bauer
Executive Director