

Exhibit 30



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DEC Position Paper on the Proposed Article XIV Constitutional Amendment Authorizing the Swap of the Lot 8 Parcel to NYCO

In 2012, the State Legislature approved a resolution to amend Article XIV of the Constitution to allow NYCO Minerals, Inc. to expand its existing wollastonite mine in the Town of Lewis, Essex County onto adjacent Forest Preserve land called Lot 8. In exchange, the resolution prescribes that the State would receive “not less than the same number of acres of land, on condition that the legislature shall determine that the lands to be received by the state are equal to or greater than the value of the land to be conveyed by the state and on condition that the assessed value of the land to be conveyed to the State total not less than one million dollars.” If the resolution receives second passage this year, the voters will decide its fate in November’s General Election.

The Adirondack Council has framed a series of considerations for assessing land swaps in the Park as part of any Article XIV proposed constitutional amendment. DEC agrees with the Council’s considerations: The Forest Preserve is perhaps New York’s most lasting conservation achievement, protected by Article XIV of the State Constitution. Amendments to Article XIV need to be considered carefully and the benefits to the future of the Forest Preserve must clearly outweigh what is lost in a land swap.

NYCO and DEC have identified up to 1,507 acres of land that are available to be used as exchange parcels should the Constitutional Amendment be adopted (see attached map). As can be seen, the proposal to allow NYCO to conduct exploratory drilling on Lot 8 and possible subsequent transfer to NYCO of the 200-acre Lot 8 in exchange for up to 1,507 acres of high value conservation land meets all of the rigorous considerations put forward by the Adirondack Council.

1. The proposed land exchange must be narrowly defined, specific in purpose, limited in scope and be supported by public policy objectives.

The proposed amendment is very narrow, specific and limited in scope: NYCO, which operates a wollastonite mine immediately adjacent to Lot 8 in the Jay Mountain Wilderness Area, would be granted the right to conduct exploratory drilling on Lot 8 to determine if the wollastonite vein continues and also to inform the appraisal of the property. If the exploratory drilling confirms that the wollastonite vein continues into Lot 8, the amendment allows NYCO to acquire Lot 8 in exchange for valuable additions to the Forest Preserve in this area. The proposed amendment also requires NYCO to reclaim Lot 8 and convey it back to the State with public access features

upon completion of mining. The proposal does not allow a land exchange for mining or any other purpose on any other Forest Preserve land.

2. The land currently in the forest preserve proposed for exchange cannot have unique biological environmental or hydrologic features, cannot include critical wildlife pathways, and cannot be part of a contiguous parcel if it would become noncontiguous after the exchange.

Lot 8 was acquired by the State in the late 1800's at a tax sale and became part of the Forest Preserve as a result. Lot 8's current forested character has environmental value consistent with forest land in the region but DEC has not identified any unique ecological or natural resource features on the property. Lot 8 has little recreational use: the parcel has no trails or campsites and public access is limited. There is no evidence that Lot 8 includes critical wildlife pathways, and it includes no brooks or streams. NYCO plans to disturb only a quarter of the 200-acre lot. At the end of the mine's estimated 20-year life, the proposed Constitutional Amendment requires the land be reclaimed with native plant species and conveyed back to the State for inclusion in the Forest Preserve. The approximately 50 disturbed acres would once again take on a wild forest character. Moreover, the amendment will not cause any Forest Preserve land to become a noncontiguous parcel. In fact, just the opposite is the case: Lot 8 will itself be returned to the Forest Preserve when mining and reclamation are complete, and additional lands would be added to the Forest Preserve which would provide significant new contiguous acreage to existing Forest Preserve lands in the Jay Mountain Wilderness, increase connectivity between the Jay and Hurricane wilderness areas and add valuable lands to the Taylor Pond Wild Forest.

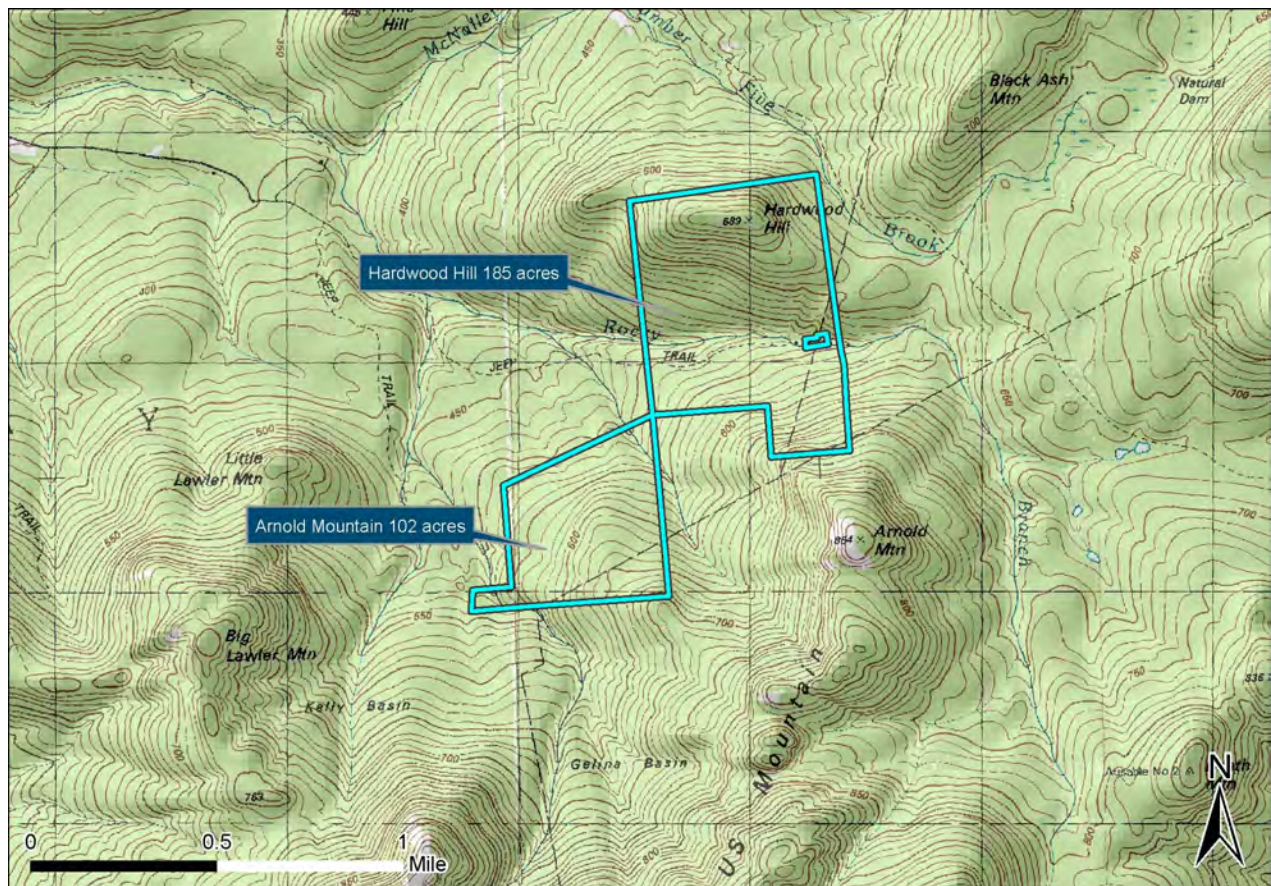
3. The ecological, biological, hydrological, physiographic, and/or locational qualities of the parcel to be received should be superior to those of the parcels being exchanged, and these qualities of the parcels to be exchanged should be such that the parcel would be a candidate for addition to the forest preserve absent any exchange proposal.

Due to the potential value of wollastonite under Lot 8 and the Amendment's \$1 million minimum value requirement, the State would receive considerably more than 200 acres in any land exchange. The exact acreage to be received will depend on DEC's independent, thorough appraisals of both Lot 8 (which will factor in the value of wollastonite under the property) as well as the property to be provided to the State in the exchange, and the adoption of legislation by the State legislature authorizing the actual exchange. The State would likely receive well more than 1,000 acres of land in any exchange.

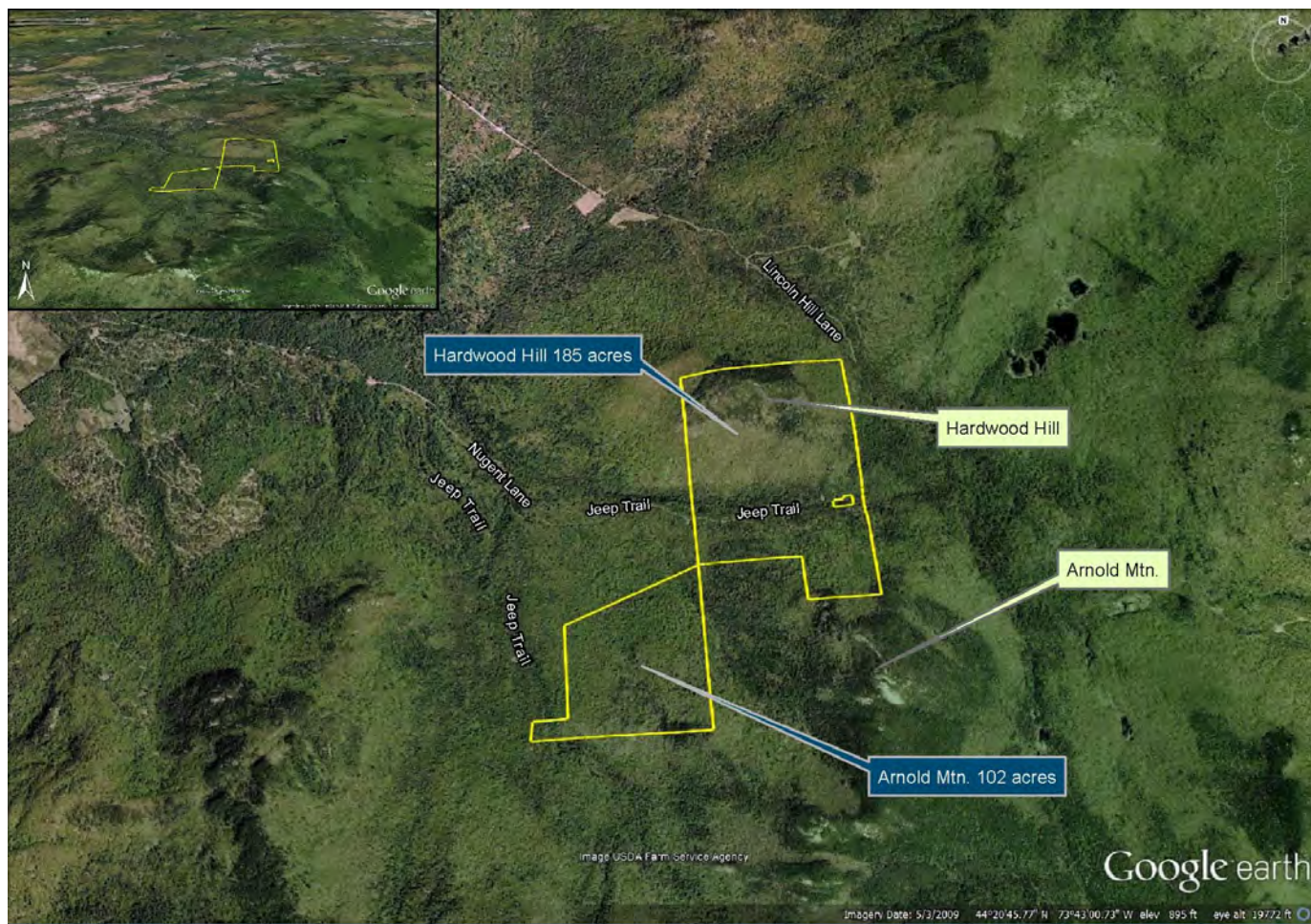
The land to be received for inclusion in the Forest Preserve would be in the vicinity of Lot 8 and provide greater natural resource, recreational and environmental value than Lot 8. The land to be received would also improve access to the Forest Preserve in the area of the Jay Mountain and Hurricane Mountain wilderness areas and Taylor Pond Wild Forest. As noted above, DEC has

reviewed land ownership in the area and identified parcels fitting these criteria, up to 1,507 acres, including parcels already owned by NYCO and parcels under agreement to NYCO that contain high quality wildlife and fishery habitat and recreational resources. Much of this area is also identified in New York State's Open Space Plan as part of the Lake Champlain Watershed priority project and two parcels are included in the Adirondack Council's 2020 report.

NYCO has agreements to purchase two properties and is pursuing a third for consideration, which would be exercised should the proposed amendment be passed by the State Legislature and approved by the electorate. These include the 185-acre Hardwood Hill parcel and the 102-acre Arnold Mountain parcel (see maps below). The 185 acre Hardwood Hill parcel lies north of and adjacent to the Jay Mountain Wilderness. The major feature of this property is Hardwood Hill which is very visible from the hamlet of Jay (see picture below). The summit of the hill is approximately 2,280 feet while the lowest elevation is in the col with Arnold Mountain, part of the Jay Mountain Wilderness. A stream flows out of the wilderness area through the col to the East Branch of the AuSable River a few miles to the west. The East Branch of the AuSable River flows north from Jay to the hamlet of AuSable Forks where it meets the West Branch of the AuSable and then east to Lake Champlain.



Hardwood Hill and Arnold Mtn. Parcels Topographic Map



Hardwood Hill and Arnold Mtn. Parcels Orthophotos



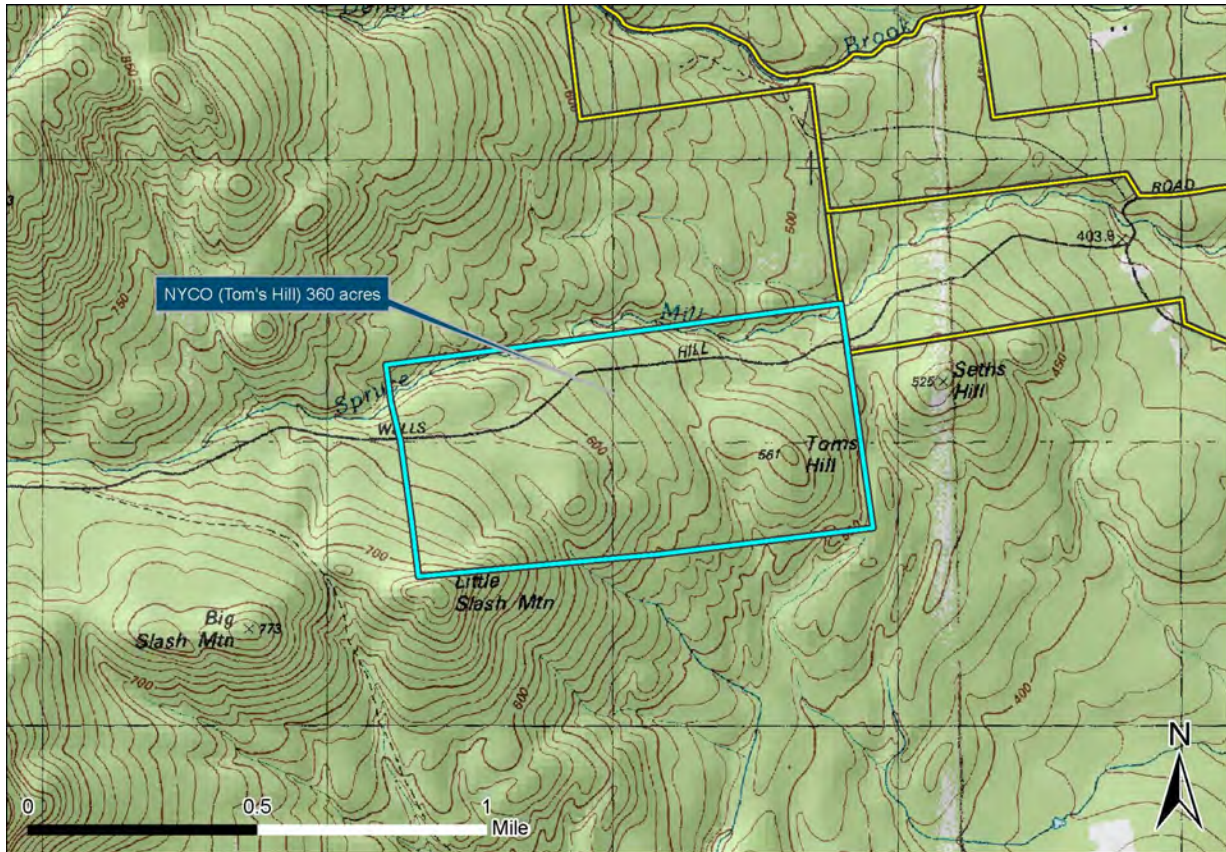
Hardwood Hill looking east from Jay

NYCO is also pursuing a 260- acre parcel, the Spruce Mill Brook tract, which contains nearly two miles of the Spruce Mill Brook, which will become available for fishing. It would also allow for the construction of a four-season parking area that will provide significant road frontage for hunters and other users of the land. The property also links the Tom's Hill and Derby Brook parcels.

The Harwood Hill and Arnold Mountain parcels, totaling 287 acres, would enhance public access to the northern reaches of the Jay Mountain Wilderness Area. The Spruce Mill Brook parcel, when coupled with the Derby Brook and Tom's Hill parcels, total 920 acres and would greatly enhance public access to the southeastern part of the Jay Mountain Wilderness Area, and the northwestern portion of the Hurricane Mountain Wilderness Area.

Additional tracts already owned by NYCO include the 360-acre Toms Hill tract (see maps below), adjacent to both the Jay Mountain and Hurricane wilderness areas. The parcel is bisected by a seasonal town road, the Jay Road, which separates the two wilderness areas and leads from the Town of Lewis to the Town of Jay (see picture below). This road has been used

for cross country skiing, hiking, access for hunting, and recently, for mountain bike racing. The property also contains more than a mile of the Spruce Mill Brook, which flows into the Boquet River and eventually Lake Champlain. Brook trout inhabit the brook and salmon stocking has occurred as well (see picture below). The brook flows through a steep, scenic ravine while passing through NYCO property. Moose have been seen on the property with moose sign frequently seen along the road.



NYCO (Tom's Hill Parcel) Topographic Map

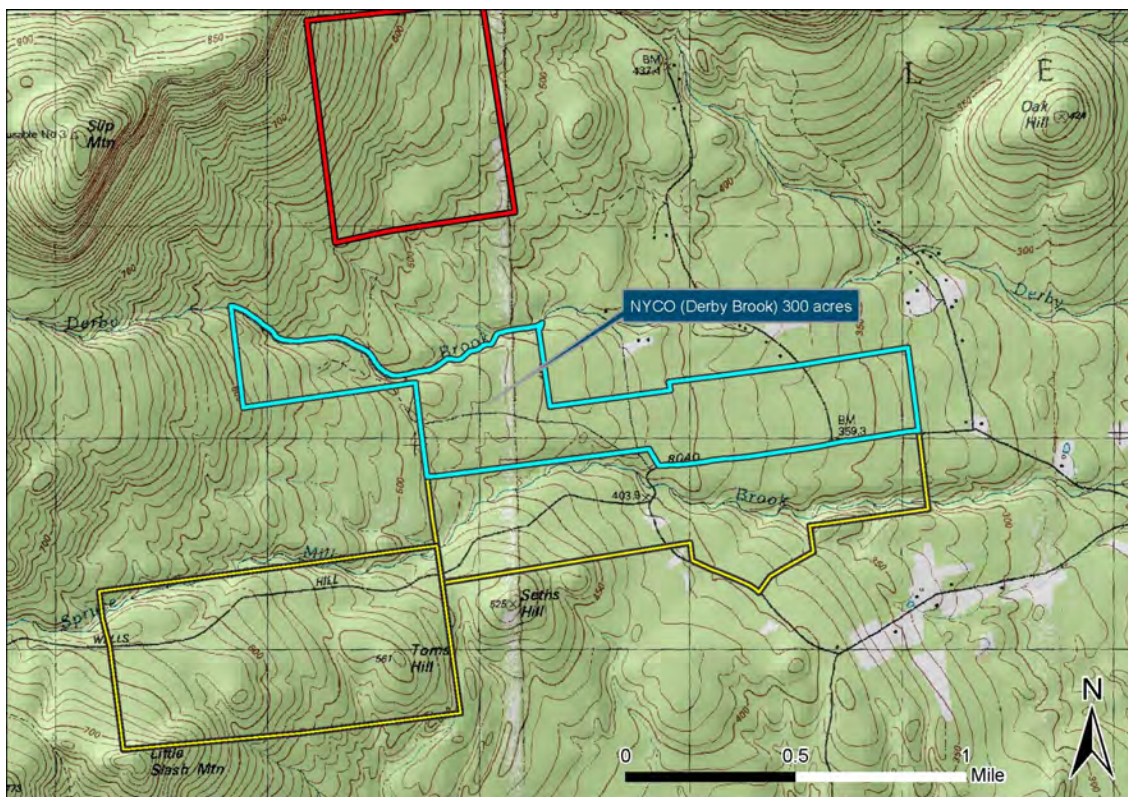


Spruce Mill Brook as it flows through Tom's Hill Parcel



Jay Road, with Jay Mtn. Wilderness on left and Hurricane Mtn. Wilderness on right

Another NYCO-owned property proposed for addition to the Forest Preserve is the 360-acre Derby Brook parcel (see map below). The parcel is bordered by Wells Hill road to the south, Derby Brook to the North and the Jay Wilderness Area to the west. Derby Brook runs from west to east for more than a mile through the property, dropping about 380 feet in elevation (see picture below). This brook runs into Spruce Mill Brook a few miles to the east and eventually into Lake Champlain. Brook trout inhabit the brook. The brook has gentler slopes where it flows through NYCO property. Running parallel and south of Derby Brook is an old log road that provides easy access to the Jay Mountain Wilderness on the east side of the range. Whitetail deer and turkey are routinely seen on the property. The highest elevation on the parcel is about 1,900 feet.

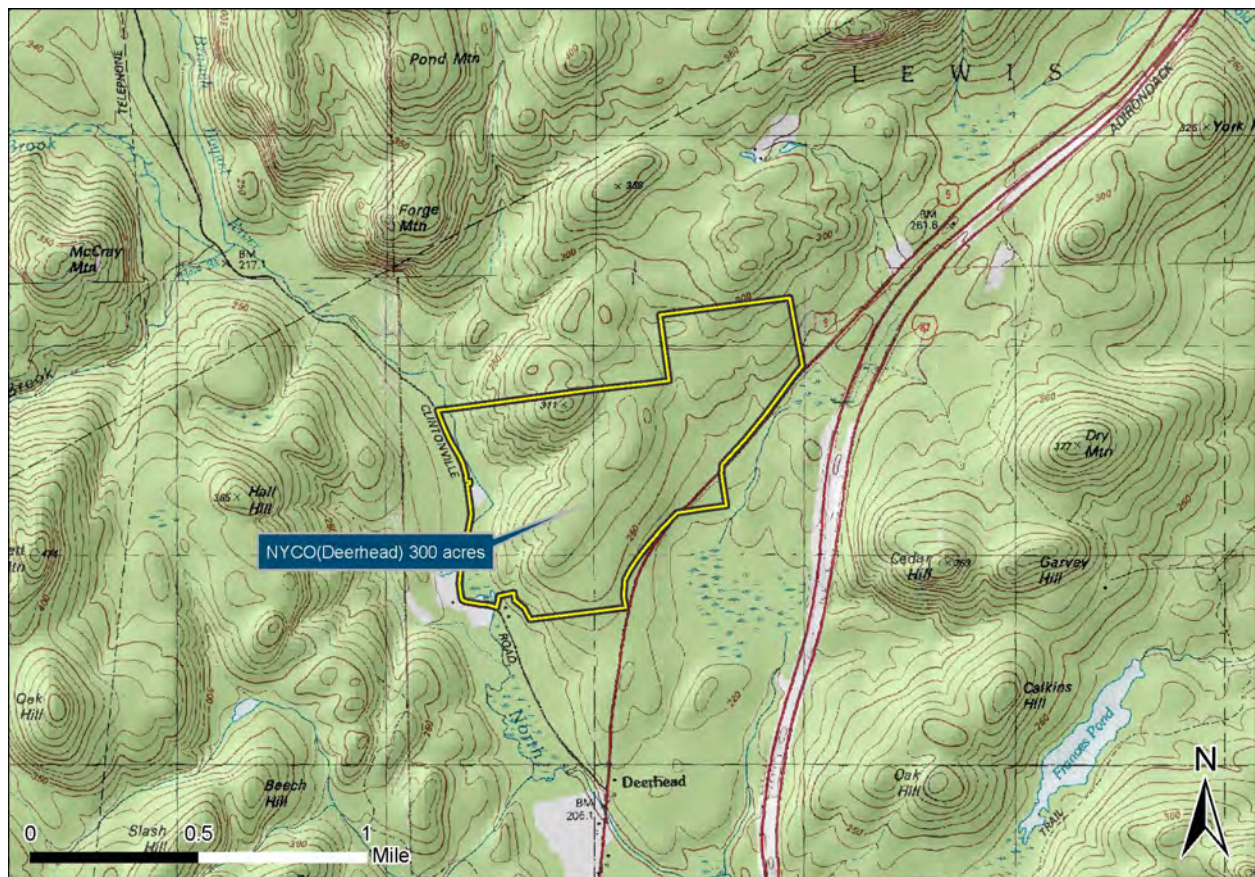


NYCO (Derby Brook) Parcel Topographic Map

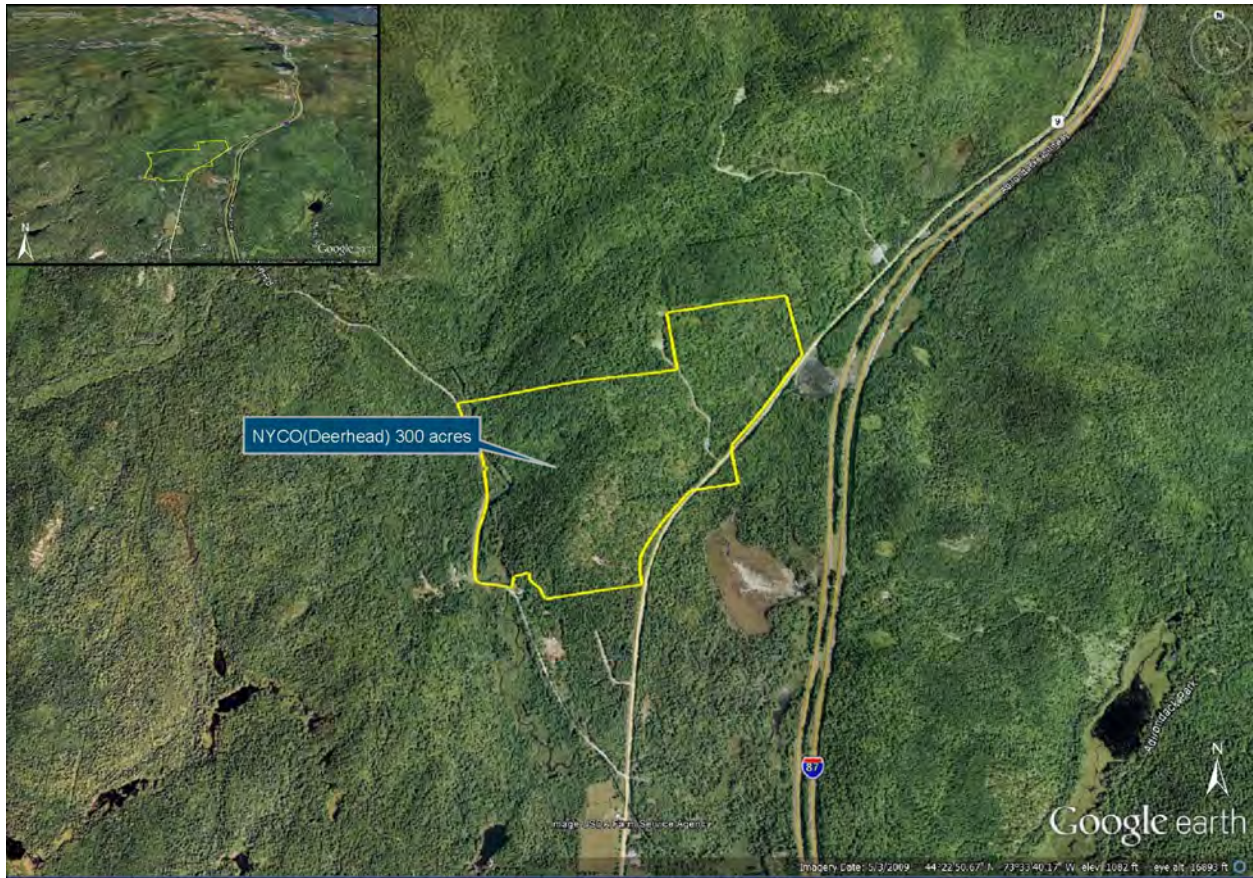


Derby Brook looking west as it passes through NYCO property

Another NYCO-owned property includes the Deerhead Parcel (see maps below). The Deerhead Parcel is approximately 300 acres in size and is made up of several small parcels of land. It is bordered on the east by NYS Rte. 9 for about 1.0 mile, on the west by Trout Pond Road (0.70 miles), and the south by a private land owner (0.4 miles). To the north the property is bounded by Burnt Pond Lands (0.7 miles) and the Taylor Pond Wild Forest. The North Branch of the Boquet River flows along the western property line, parallel to the Trout Pond Road. Brook trout inhabit the river and Great Blue Heron are frequently seen. The river eventually links up with the main branch of the Boquet River several miles to the southeast in Willsboro and drains into Lake Champlain.



NYCO (Deerhead) Parcel Topographic Map



NYCO(Deerhead) Parcel OrthoPhoto



The Boquet River as it passes through the Deerhead Parcel. This property is adjacent to one of the Taylor Pond Wild Forest parcels and property currently being negotiated between Land Vest and the Northeast Wilderness Land Trust for preservation (see map below).



Spruce Mill Brook Topographic Map

4. If:

a. the land received will not add significantly more acres to the forest preserve than contained in the acreage of lands taken out of the Preserve, or

b. the appraised value of the parcel(s) being received is not substantially higher than the appraised value of the parcel being given up,

then the parcel(s) to be received must be overwhelmingly superior to that being exchanged taking into consideration biodiversity flora, fauna, animal pathways, watershed characteristics, streams, lakes and other waterbodies in the parcel(s).

The total acreage to be conveyed into the Forest Preserve would greatly exceed the 200 acres in Lot 8 proposed to be conveyed to NYCO because the proposed amendment requires that the exchange land conveyed into the Forest Preserve be valued at no less than \$1 million and could exceed \$1 million in value depending upon the results of the Lot 8 appraisal. Assuming that

forest land in the area of the NYCO mine appraises at \$1,000 per acre, the \$1 million minimum that NYCO would be required to use to purchase replacement land would result in the purchase of 1,000 acres for inclusion in the Forest Preserve. Thus, the Forest Preserve will be receiving a minimum of 5 times more land for inclusion in the Forest Preserve than will be temporarily conveyed to NYCO. Furthermore, the value to the Forest Preserve, from both a public access and a natural resources perspective, clearly outweigh the values of Lot 8.

5. Any impact of the proposed exchange on local communities must be, on balance, substantially to the benefit of those communities.

For Essex County and the towns of Willsboro and Lewis, passage of the NYCO Amendment is critical to the economic health of these already distressed rural economies. NYCO employs approximately 150 local residents who have few alternative employment opportunities. NYCO indicates that defeat of the amendment will cause it to either shift its mine to other Essex County property it owns or more quickly phase out and entirely shut down its New York State operations. Mining other NYCO property would result in significantly greater environmental disruption involving more earthmoving and expensive extraction methods because the wollastonite vein is deeper in the earth and interspersed with more rock (known as overburden and interburden respectively) than would be required by mining Lot 8. The Constitutional Amendment would avoid the economic disruption that would result from mining other property or closing NYCO's mining operation while providing significant additions to the Forest Preserve.

6. Taken as a whole, the proposed land exchange must achieve a significant improvement to the Forest Preserve and/or a long-term benefit either to the local communities being affected or to the People of the State in general.

As discussed above, the proposed Constitutional Amendment, by both adding significant acreage to the Forest Preserve and sustaining the economic vitality of the towns of Lewis and Willsboro, would substantially benefit the people of the State of New York, the Forest Preserve and communities and residents throughout Essex County which rely on NYCO.

7. Each land transfer that requires an Article XIV Amendment will be treated as an individual and unique event, requiring its own review, assessment, and comment.

The proposed NYCO Amendment should be evaluated on its own merits. Each constitutional amendment undergoes three separate rigorous review processes, including: Legislative approval by two different sessions of the Legislature and voter approval at a general election. Further, the passage of the NYCO Amendment does not set precedent for the passage of similar future constitutional amendments. A look at prior constitutional amendment proposals reveals passage of one amendment does not mean that similar subsequent amendments will be routinely adopted. For instance, proposals to develop downhill ski areas on Forest Preserve lands on Belleayre, Whiteface and Gore mountains have been approved, but subsequent similar proposals to develop

downhill ski areas on Hunter, Hoffman, Blue Ridge and Peaked Hill Mountains were rejected. Moreover, history confirms the difficulty in securing any amendment to Article XIV, as the overwhelming majority of attempts to amend Article XIV have been unsuccessful

Lands to be swapped: Lot 8

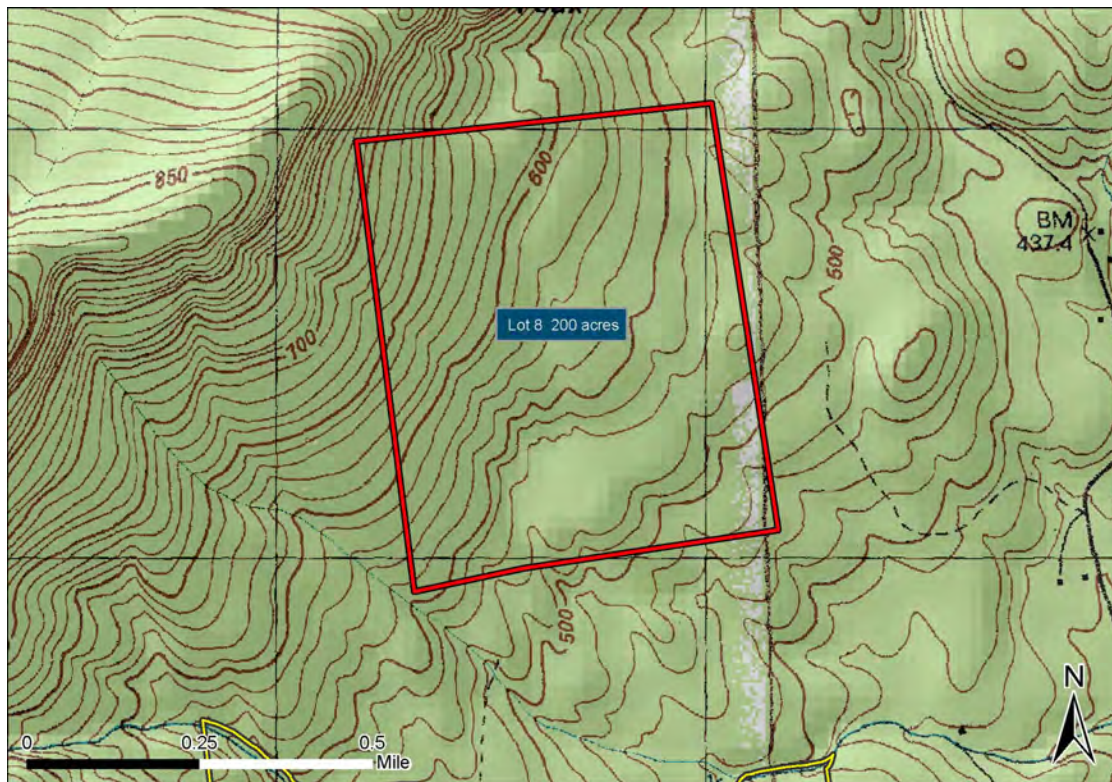
The proposed constitutional amendment would allow NYCO to acquire Lot 8 to continue its mining operation that employs 150 people in Essex, NY. As one can see by the following maps and photos, Lot 8 is immediately located next to NYCO's existing wollastonite mine. As one can see Lot 8, while forested, contains no exceptional natural resource features and contains no formal public access. The amendment would require NYCO to reclaim this piece, with designed public access as part of the reclamation project. Only about 50 of the 200 acres would be disturbed by the mining process.



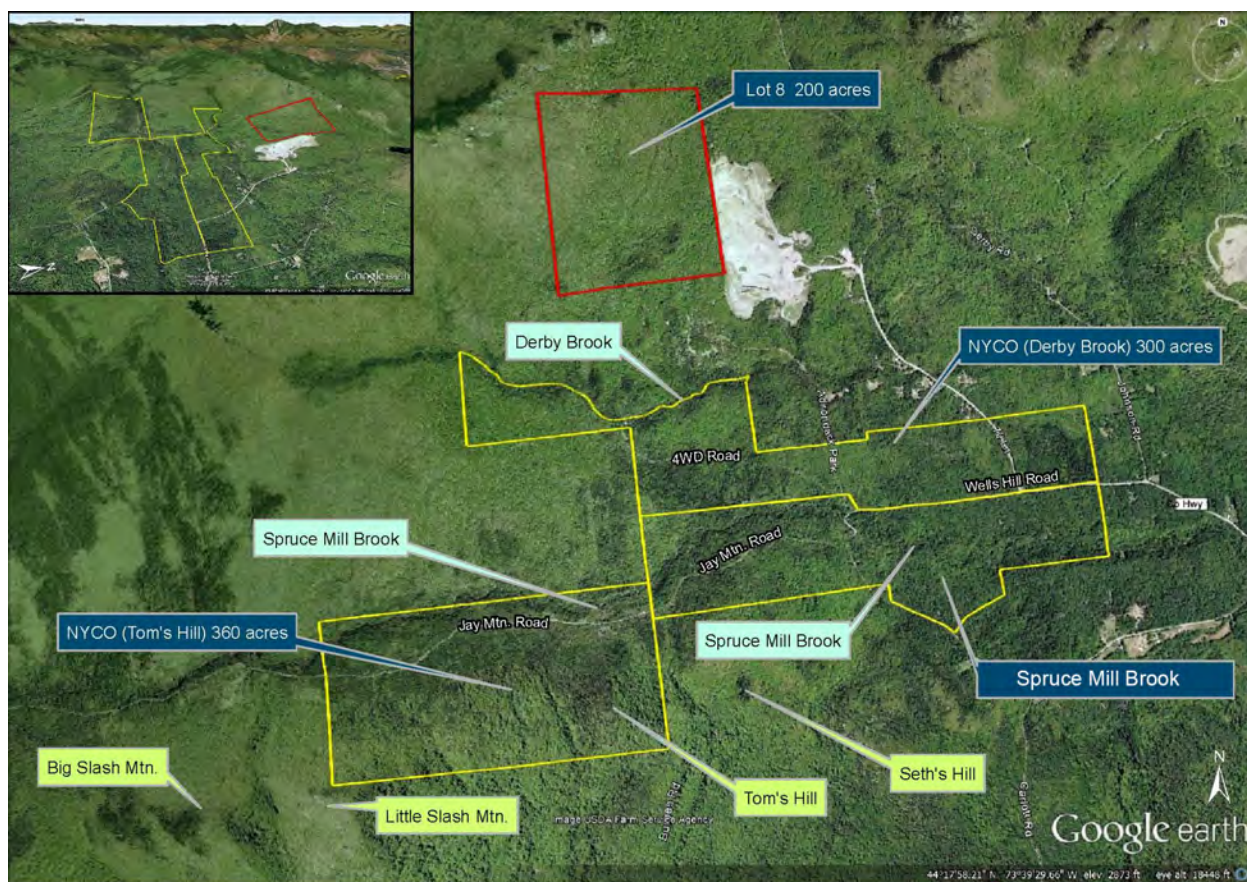
The existing mine, looking west to Lot 8, the proposed land swap



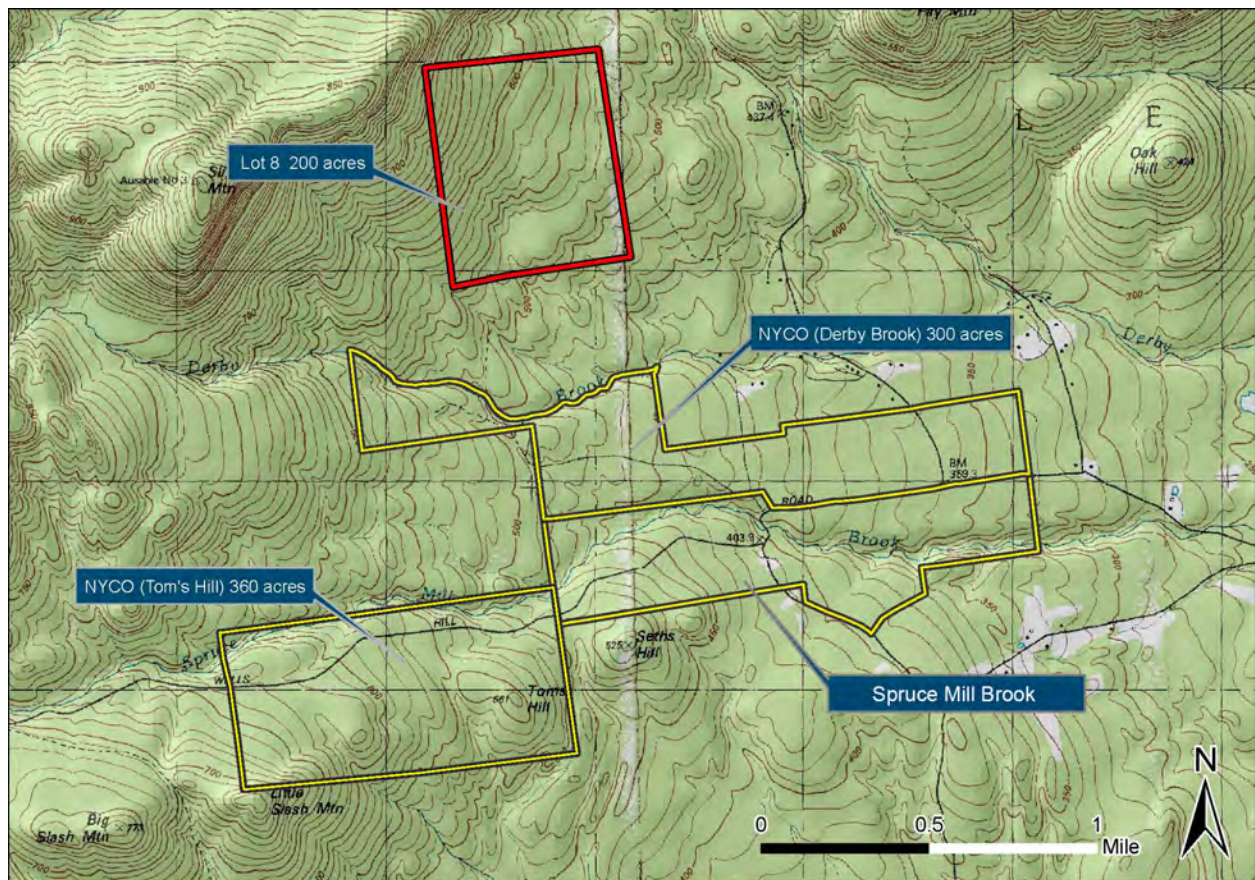
Lot 8 interior



Lot 8 Topographic Map

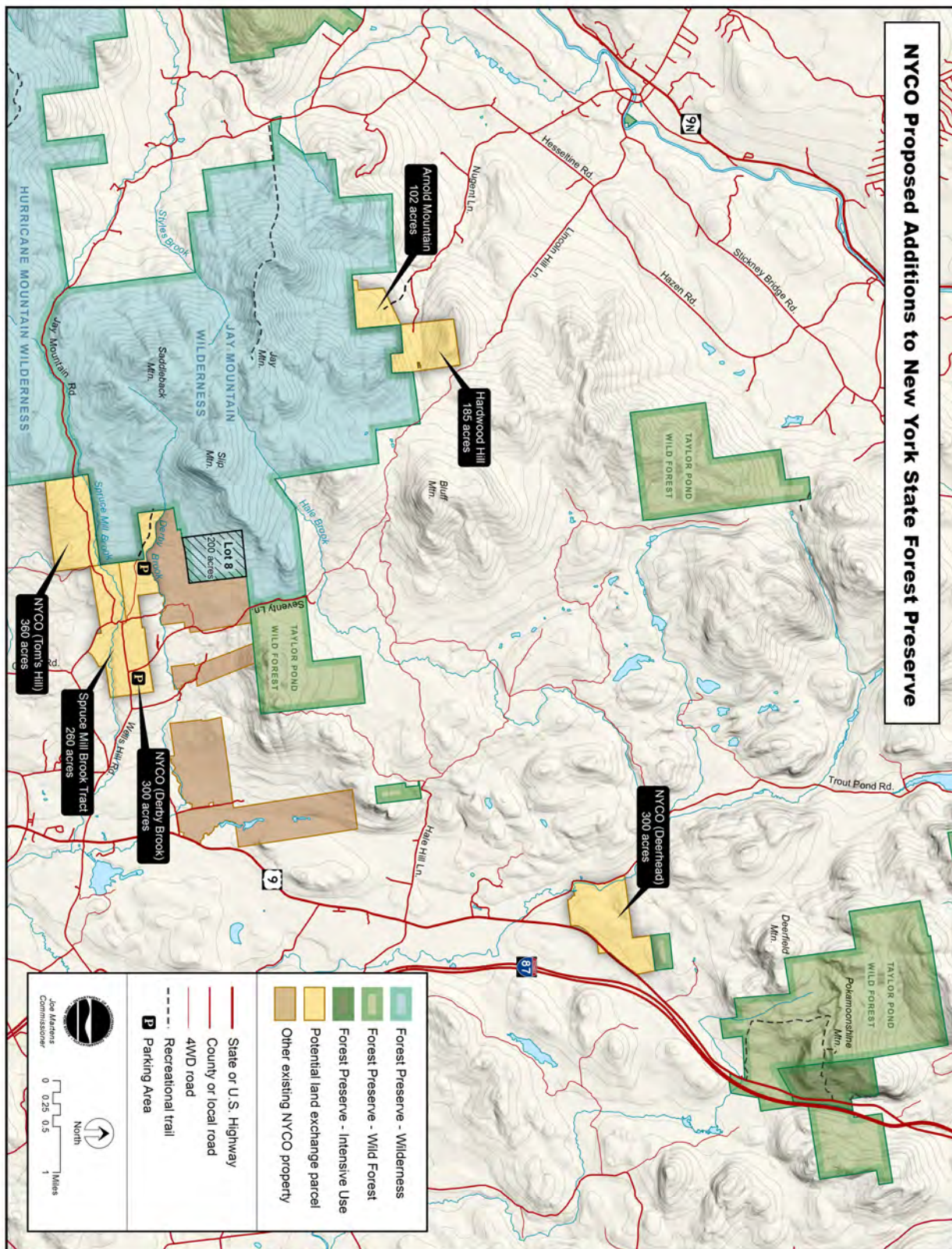


Orthophoto depicting the existing mine immediately adjacent to Lot 8 and some of the parcels that would be added to the Forest Preserve



Topographic map depicting the existing mine immediately adjacent to Lot 8 and some of the parcels that would be added to the Forest Preserve

Map depicting proposed additions to New York State Forest Preserve as a result of proposed constitutional amendment.



Ecological Information available to DEC on potential NYCO swap lands

Prepared by: DEC Region 5 Raybrook office

1. Derby Brook Tract
 - a. No known unique forest communities or land features
 - b. Improves access to eastern portion of Jay Mountain Wilderness.
 - c. Provides access to lower reaches of Derby Brook.
 - d. Improves 4-season access to area
 - e. Provides significant road frontage for hunting
2. Spruce Mill Brook Tract
 - a. No known unique forest communities or land features
 - b. Provides access to lower reaches of spruce Mill Brook.
 - c. Improves 4-season access to area
 - d. Provides significant road frontage for hunting
3. Tom's Hill Parcel
 - a. No known unique forest communities or land features
 - b. Provides access to lower reaches of spruce Mill Brook.
 - c. Provides significant road frontage for hunting
4. Deerhead Parcel
 - a. Provides significant road frontage for hunting
5. Arnold Mountain parcel
 - a. Contains potential habitat for *Diphasiastrum complanatum*, (northern running-pine) a New York endangered plant species (as per New York Natural Heritage Program data)
 - b. Parcel would be hard to access for recreational purposes without deeded access over Ward Lumber lands.
6. Hardwood Hill Parcel
 - a. Summit of Hardwood Hill appears to have rock outcrops.
 - b. May contain fire adapted forest communities.
 - c. May provide views.
 - d. Parcel would be hard to access for recreational purposes without deeded access over Ward Lumber lands.

Ecological Information on potential NYCO swap lands from the Natural Heritage Program

- Lot 8 (current Forest Preserve land) has no records of rare animals or plants, or of significant natural communities, in the Heritage database. Lot 8 also has no classified streams. There are no wetlands mapped by APA on Lot 8.
- The Deerhead tract (current NYCO land) includes a stretch of the North Branch of the Boquet River, where the rare mussel, Eastern pearlshell (*Margaritifera margaritifera*) occurs. (Although not listed as Endangered or Threatened by NYS, Natural Heritage ranks this species as S2, imperiled, in New York State.)
- Reviewing the APA wetlands layer, there are wetlands along the North Branch Boquet River on the Deerhead tract, and a couple of small wetlands on the Tom's Hill tract.
- Reviewing the NYS DEC water classifications of the following streams which flow through NYCO tracts, all are classified as trout waters:
 - Spruce Mill Brook: AA(T)
 - Derby Brook: C(T)
 - North Branch Boquet River: C(T)
 - Rocky Branch (Hardwood Hill tract): AA(T)