



PRESS RELEASE  
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## APA Aims to Limit Public Comment Opportunities

*APA is trying to change its “Public Comment Policy” to make it more difficult for the public to submit comments and provide less public input*

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The Adirondack Park Agency (APA) is seeking to make changes to its Public Comments Policy. The proposed changes will limit public access and participation and make the APA less open and less transparent. The APA is seeking to reduce opportunities for in-person public comments at its monthly meeting and shorten the time period for the public to submit written comments.

“The efforts by the APA to reduce public comment opportunities are counter to Governor Hochul’s call for state agencies to be more open and transparent. These moves by the APA stiff-arm the public in their efforts to share their concerns with a variety of pertinent Adirondack matters,” said Peter Bauer, Executive Director of Protect the Adirondacks.

**Written Public Comment Period Should Not be Changed without Adding Adequate Time for Review:** The APA also proposes to move up the deadline for when written comments to the Board must be submitted before its monthly meeting from noon on the day before the meeting to “close of business” three days before the APA meeting. Currently, the APA monthly meeting usually starts on a Thursday and all public comments are due by Wednesday at noon. The APA wants to change this so that all comments must be submitted by Monday at 5PM for a Thursday meeting.

“The problem with this proposal is that the APA often does not post its meeting materials until Friday afternoon, less than one week before the APA’s monthly meeting. A press release and agenda are sent out earlier, but the public needs the meeting materials, which includes staff reports, draft permits, and draft resolutions, among many other things, in order to draft comments,” said Claudia Braymer, Deputy Director of Protect the Adirondacks. If the APA is successful with this change, it would force the public to draft

comments over a weekend, a burden that will severely limit public participation.

If the APA is going to change the deadline for public comments to its monthly meeting, then the APA should release its meeting materials earlier to the public. The additional time will give the public a fair opportunity to review and comment on the materials provided for an APA monthly meeting. Otherwise, according to current APA practice of posting materials online late on Friday afternoon, the public would be required to review all of the materials, conduct extensive legal and policy research, and prepare written comments over the weekend and on one business day. That is an unfair burden to place on the public, especially when it can be remedied by simply having the materials posted online by the APA earlier.

**Public Comments Should be Posted:** One problem that the APA fails to address is that public comments submitted to the APA before a monthly meeting often fail to reach the APA Board. The APA's delivery system for public comments is ad hoc and haphazard. It's clear from discussions at the APA meetings, that many Board members have not read important public comments. Any changes to the APA's Public Comments Policy should include a section that details the process for how comments are delivered to the Board and to document that they were read in advance of the meeting.

### **Protect the Adirondacks**

Protect the Adirondacks is an IRS-approved non-profit organization dedicated to the preservation and stewardship of the 6-million-acre Adirondack Park. Our mission is to protect the Adirondack Park's wild character for current and future generations. PROTECT pursues this mission through a combination of advocacy, grassroots organizing, independent public oversight, research, water quality monitoring, education, and legal action. Protect the Adirondacks was formed in 2009 as the result of a merger between two long-standing environmental conservation groups in the Adirondack Park, the Resident's Committee to Protect the Adirondacks (est. 1991) and the Association for the Protection of the Adirondacks (est. 1901).

Protect the Adirondacks is managed by a 22-member Board of Directors of Adirondack leaders with expertise in environmental law, local government, Adirondack environmental and cultural history, state agency management, and small business. Protect the Adirondacks maintains an office in a 100% energy efficient, solar-and wind-powered office in Johnsbury in the central Adirondacks. For more information see [www.protectadks.org](http://www.protectadks.org) and @ProtectAdkPark.

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