



May 8, 2018

Terry Martino, Executive Director
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Re. Unit Management Plan Amendments and Public Comment

Dear Terry,

We write to express concern about a joint, simultaneous public comment period for the Department's Initial Draft Unit Management Plan amendments for the High Peaks Wilderness and Vanderwhacker Wild Forest. Given the size and scope, complexity and controversy of these initial draft UMP amendments, the proposed joint, minimal 30-day comment period would not be in keeping with APA's policy for review of Unit Management Plans pursuant to the State Land Master Plan.

The agency has repeatedly reassured APA Members and the public that a joint APA-DEC review period for UMPs would only be undertaken for minor, small, non-controversial plans affecting Forest Preserve - such as small DEC public campgrounds. APA has assured the public that for large, complex management plans, the adopted APA Policy, Procedures and Guidance for Review of UMPs would be followed which call for separate DEC and APA review and public comment periods.

The length and complexity of both of these UMP amendments affecting public access and use of some of the most controversial public lands in the Park, including approaches to and management of additions to its largest Wilderness, place these amendments on a scale equal to many complete draft Unit Management Plans across the Park. Therefore, they deserve separate DEC and APA review and public comment periods consistent with your adopted policy.

APA ought not to determine SLMP compliance of these complex amendments without taking the time to seriously weigh public comments to DEC, APA internal staff comments, APA Member comments, and DEC revisions to the initial draft. In order to properly consider all of these comments, APA ought to require, at minimum, a 30-day public comment on the initial DEC drafts, followed by a final DEC drafts, and a 60-day agency review of final drafts

incorporating an additional public comment opportunity and, if possible, public meetings or legislative hearings.

Thank you for considering our recommendation.

Sincerely,

A handwritten signature in black ink that reads "David Gibson". The signature is written in a cursive style with a long horizontal stroke at the end.

David Gibson

A handwritten signature in black ink that reads "Dan Plumley". The signature is written in a cursive style.

Dan Plumley

Staff Partners with:

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