KATHY HOCHUL
Governor

BARBARA RICE
Executive Director

TO: Ken Lynch, State Land Committee Chair

FROM: Megan Phillips, Deputy Director, Planning

DATE: June 6, 2025

RE: APA's 2024-25 Proposed Final Amendments to the Adirondack Park State Land Master Plan (APSLMP)

Agency staff have prepared, in consultation with the Department of Environmental Conservation (DEC or Department), a package of proposed final amendments to the Adirondack Park State Land Master Plan.

At the September 12, 2024 Agency meeting, staff presented a summary of the amendments package to APA board and received authorization to proceed as lead agency under the State Environmental Quality Review Act (SEQRA). In October, the Agency issued a negative declaration under SEQRA and initiated a 60-day public comment period. During that period, staff held three public hearings. The comment period closed on December 2, 2024.

The Agency received 1,238 written letters during the comment period. Of these letters, 307 were unique (25%) and 931 were form letters (75%). Most letters included comments pertaining to multiple topics in the proposed amendments package. In addition, 27 people offered verbal comments during the hearings. A table summarizing the comment topics is included below:

Table 1. Public Comment Summary

__Amendment Topics__	__Total Distinct Comments Received__
Accessibility (critical)	906
Accessibility (supportive)	51
Beaver control structures	16
Bicycle trails	3
Classification of Four Peaks tract	4
Climate change	583
Conservation easements (Appendix II)	3
Former roads	4
Historic areas	7
Horse mounting platforms	1

Motor vehicle use for removal of non-conforming structures, post phase-out period	232
Opening quote	4
Primitive tent sites	1
Removal of dates/deadlines that have passed	228
Typos/errors	0
Visitor use management	603
Wildlife management structures	37
Other (not related to amendments package)	256
Non-Substantive (not Master Plan or amendment-related)	37

The Agency has prepared a comprehensive response to comments document that is posted with APA board meeting mailing materials in addition to our proposed final amendments redline document.

In response to comments received and subsequent follow up with Department staff and additional policy research, APA staff are proposing several changes from the original package. The mailing packet contains a redline version of the Agency's proposed final amendments to the text of the APSLMP. These changes to the final proposed package are summarized in the table below. Please note that the table is not an exhaustive summary of all amendments in the package, only the changes that were made from the September 2024 public draft to the current proposed final draft.

Table 2. Changes from the Draft to Proposed Final Amendments Summary

Topic / Page #	Proposed Draft Language	Proposed Final Language *(Only changes are noted)*	Rationale
Opening quote 5	Quote by Oren Lyons, taken from a message to the NGOs of the United Nations in Geneva, Switzerland in September 1977.	Quote by Anne LaBastille, Adirondack writer and conservationist, and former APA board member.	Quote was removed per the request of Oren Lyons.
Climate change 12 (UMP Development) 13-14 (Intro-new section)	Add new section to "Introduction," articulate what is required in each UMP.	Introduction - change "capture" to "mitigate" with respect to statement about Forest Preserve and greenhouse gas emissions.	Revised language to be more scientifically accurate based on public comment and input from APA RASS division.
Visitor use management	Add new language to clarify how DEC is to fulfill carrying	1st paragraph: Change "establishing desired conditions, indicators.." to	Make clear the relationship between desired conditions and indicators.

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11 (UMP Development)	capacity requirements by utilizing the VUM framework during the UMP process.	"desired conditions and associated indicators for specific attributes." 2nd paragraph: Rework second and third sentences for clarity and accuracy to align with terminology on p. 46 of the federal IVUMC terminology. Revised language reads: "Establishing a number of visitors is one strategy to protect resources and experiences, while allowing for recreational use. Visitor use management actions include site management and engineering, information and education, and regulations and enforcement."	Revise language in second paragraph to explain three broad buckets of VUM "actions" that can be undertaken (the three E's – engineering, education, enforcement). Remove language about "building facilities that can accommodate heavy use." Language was re-worked in response to public comments.
Accessibility 13 (Intro-new section); 20, 23 (Definitions)	Replace existing bullet in UMP development with two new ones. Add new introduction section detailing requirements under federal laws and regs. Add new definition of other power-driven mobility device, new definition for wheelchair, amend definition of motor vehicle.	Remove "The DEC is responsible for interpreting federal regulations and guidance to determine where the use of OPDMDs may be appropriate." Remove OPDMD definition; remove OPDMD exclusion from motor vehicle definition. Reference implementing regulations, ensure citations refer to full part of code of federal regulations (CFR). Replace "DEC" with "State of New York" in reference to who adheres to federal regulations and accessibility standards.	The public response to the proposed Master Plan amendments was tremendous. The majority of comments focused on the accessibility amendments, where the public voiced strong opposition to the addition of other power-driven mobility devices language. Recognizing this, we are stepping back to review this specific part of the package. The rest of the proposed amendments will be brought before the board for discussion and, eventually, a vote later this year.

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			We are aware that DEC is developing a draft statewide policy concerning the use of mobility devices. The Agency will continue to be a partner in the development of the policy as it pertains to the Adirondack Forest Preserve. Other revisions in "Introduction" provide clarity and proper citations of federal law and regulations.
Beaver control structures 19 (Definitions); 26 (Wilderness structures & improvements); 33 (Primitive structures & improvements); 40 (Wild Forest structures & improvements)	Add new definition of beaver control structures (BCS); specify where these structures are conforming.	Wilderness – Clarified that BCS will be permitted where beaver activity may "render ineffective" fish barrier dams (rather than "cause damage to"). Removed culvert right-sizing as priority management solution. Wild forest – remove language about BCS being used to prevent introduction of invasive species. Add right-sized culverts as a management solution for beaver-related impacts.	Revision regarding fish barrier dams made for clarity. Culverts not conforming in Wilderness, we folded that management option in beginning in the Wild Forest classification. Invasive species prevention is not the purpose of beaver control structures, language caused confusion amongst commenters.
Removal of UMP deadlines 12-13 (UMP Development)	Removal of outdated deadlines for completion of all UMPs.	Revised language to: -include the APA as an accountability partner in completing UMPs -highlight management that DEC can undertake without a completed UMP for an area -emphasize UMP development as a key priority for both agencies and recognize the importance of public involvement in planning for use of public lands.	Revisions made in response to public comments.

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