From: noreply-pc@apa.ny.gov
Sent: Thursday, October 15, 2026 12:06 PM
To: APA Regulatory Programs Comments
Cc: jpatrickreed50@gmail.com
Subject: APA Project 2026-0202 Public Comments

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********** PLEASE NOTE **********

The following public comment was made with your email address as the source.
If this is an error, please contact the New York State Adirondack Park Agency at 518-891-4050 or by sending an email to RPcomments@apa.ny.gov.
Please copy "2026-0202, Jacob Reed, jpatrickreed50@gmail.com" into your message for our reference.

****

Attn: Aaron Ziemann
Comments from: Jacob Reed
Email from: jpatrickreed50@gmail.com
Address:
Re: Agency Project 2026-0202, Lyme Timber Company

My Comments:

I support this project as long as efforts are made to protect a nearby bodies of water from sediment, fuel, or oils that are spilled.

From: Christopher Amato <conservationdirector@protectadks.org>
Sent: Wednesday, October 28, 2026 2:55 PM
To: APA Regulatory Programs Comments
Cc: Executivedirector@protectadks.org
Subject: Project 2026-0202; Lyme Timber Company; Aaron Ziemann
Attachments: PROTECT comments on Lyme Timber clearcut 10.27.2026.pdf

Attention: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Ziemann:

Attached please find the comments of Protect the Adirondacks regarding the above-referenced project.

Sincerely,

Christopher Amato
Conservation Director and Counsel
Protect the Adirondacks
P.O. Box 48
North Creek, NY 12853
(518) 251-2700 (o)
(518) 860-3696 (c)

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Peter Bauer
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Via Email

October 28, 2026

Aaron Ziemann
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

RE: Lyme Timber Company
Clearcutting Application
Town of Arietta, Hamilton County
APA Project No.: 2026-0202

Dear Mr. Ziemann:

Protect the Adirondacks (PROTECT) appreciates the opportunity to provide comments on the application by Lyme Timber Company (Lyme) for approval of timber harvesting activities on approximately 500 acres of land in the Town of Arietta, Hamilton County (the Project). The Adirondack Park Agency (APA) has permitting jurisdiction over the Project because it meets the jurisdictional threshold for clearcutting set forth in 9 NYCRR § 573.7(b).

According to the application, the Project will consist of a shelterwood removal cut requiring the clearcutting of approximately 496 acres. The Project site is bordered by the Jessup River to the north and Big Brook to the south, and includes numerous jurisdictional wetlands, vernal pools, and perennial and intermittent streams. The Project site is classified as Resource Management by the Adirondack Park Land Use and Development Plan Map and is subject to a working forest conservation easement ("Easement") owned by the State of New York.

PROTECT respectfully urges that the application be considered by the APA Board and that it be denied. As discussed below, the permit application is incomplete and inadequate and thus APA cannot make the requisite statutory findings for approving the Project. Among the serious deficiencies in the application are the following:

(i) It does not include the ecological and site-specific baseline information and mapping required by APA regulations for clearcutting applications as set forth in 9 NYCRR § 537.7(c) and by the APA clearcutting permit application;

(ii) It does not include the locations and boundaries of all streams and wetlands on the Project site and the few streams and wetlands depicted on the applicant's maps have apparently not been field-verified. Additionally, it appears that there has been no site visit by APA staff to verify the location and boundaries of wetlands (including vernal pools and vernal pool complexes) and perennial and intermittent streams on the site;

(iii) It includes no analysis of the Project's potential environmental impacts;

(iv) It includes no analysis of the Project's consistency with the terms of the Easement and, in fact, the Project is inconsistent with those terms; and

(v) The climate change impacts of the Project have not been considered or addressed.

The Project Site is Ecologically Sensitive

The approximately 496-acre Project site includes a variety of ecologically sensitive areas, including an unspecified number of permanent and intermittent streams; and an unspecified number of wetlands, vernal pools and, potentially, vernal pool complexes. The eastern boundary of the Project site is immediately adjacent to, and proposes clearcutting up to the edge of, the Jessup River Wild Forest. The western boundary of the Project site is adjacent to the West Canada Wilderness.

The ecological significance and sensitivity of this landscape is underscored by the State's prior purchase of a conservation easement over the entirety of the Project site. A State-owned conservation easement "limits or restricts development, management or use of . . . real property *for the purpose of preserving or maintaining the scenic, open, historic, archaeological, architectural, or natural condition, character, significance or amenities of the real property . . .*" ECL § 49-0303(1); (emphasis added).

Furthermore, the lands comprising the Project site are classified as Resource Management under the Adirondack Park Land Use and Development Plan, which means they "are characterized by substantial acreages of one or more of the following: shallow soils, severe slopes, elevations of over twenty-five hundred feet, flood plains, proximity to designated or proposed wild or scenic rivers, wetlands, critical wildlife habitats or habitats of rare and endangered plant and animal species." Executive Law § 805(3)(g)(1). In addition, "[t]he basic purposes and objectives of resource management areas are to protect the delicate physical and biological resources, encourage proper and economic management of forest, agricultural and recreational resources and preserve the open spaces that are essential and basic to the unique character of the park." *Id*. § 805(3)(g)(2).

Despite these clearly defined environmental values and protections, the applicant failed to submit a detailed natural resource inventory of the Project site. Instead, the applicant submitted its Forest Management System manual, which provides only a generic overview of all Lyme-owned

timberlands in the Adirondack Park. Nor did the applicant submit the detailed natural resource map required by both APA regulations and the APA clearcutting application. As a result, there is no site-specific baseline information concerning the ecologically sensitive areas and plant and animal species present on the Project site, rendering a full assessment of the Project's impacts impossible.

The Application Does Not Include the Baseline Information Required by APA Regulations

The APA regulations clearly define the baseline information required for a clearcutting permit application. Specifically, the applicant must include detailed mapping and documentation that includes a map of the proposed clearcut area and all lands within one-quarter mile that shows (i) all wetlands, unique natural and cultural features, areas with slopes in excess of 25 percent and water bodies; (ii) the location of all existing and proposed roads, stream crossings and culverts; and (iii) all proposed buffers. *See* 9 NYCRR § 573.7(3)(1). In addition, the APA clearcutting application specifies that the application must include a clearly labeled scaled site plan map that depicts (i) the location of existing and proposed buildings, woods roads, landings, stream crossings, and culverts; (ii) wetlands, water bodies, and topography; (iii) proposed buffers; and (iv) areas where public access is provided.

The application submitted by Lyme does not comply with any of these requirements. Neither the timber harvest plan map, the location map, nor the accompanying narrative identify the locations of any proposed roads, culverts, stream crossings, buildings, landings, or buffers. The timber harvest map has no elevation markings and does not show slopes. In addition, the timber harvest plan map does not show public access areas or routes. Notably, the 2026 Speculator Tree Farm Perkins Clearing Burnham Mountain Recreation Management Plan shows public recreation facilities in the area of the tract proposed for clearcutting, as well as leased camp locations, none of which are shown on Lyme's timber harvest plan map. Although the harvest map appears to show the general location of some wetlands, there is no evidence that the locations and boundaries of those wetlands were verified in the field, nor are the qualifications of the person who did the mapping provided. Moreover, the precise locations of streams and buffers for those streams are not shown on the timber harvest plan map. In summary, the application fails to include a site plan map that contains the basic elements required by APA regulations and APA's clearcutting application.

Finally, there is no indication in the Project file that APA staff conducted a site inspection to verify the locations and boundaries of wetlands (including vernal pools) and streams on the Project site.

The Application Includes No Analysis of Potential Environmental Impacts

Despite the recognized ecological sensitivity and significance of large portions of the Project site, the application contains no analysis or evaluation of the potential environmental impacts associated with the proposed timber harvesting activities. The proposed operation would affect hundreds of acres of forestland, as well as a network of streams, wetlands, and other sensitive natural features, including adjoining and nearby areas of Forest Preserve. Yet the application is silent on how these resources may be impacted.

The absence of even a basic environmental impact analysis is particularly concerning given the scale of the proposed clearcutting and the presence of multiple overlapping environmental protections. Without this information, neither the APA nor the public can meaningfully evaluate the potential short- or long-term consequences of the Project. A comprehensive and site-specific environmental review is essential to ensure that the Project does not result in undue adverse impacts to the Park's ecological integrity, water resources, and biodiversity.

The Application Fails to Include Any Protective or Mitigation Measures

The harvest plan claims that "appropriate buffers" as described in Lyme's generic Forest Management System manual will be applied to wetlands and streams, but there is no explanation of what restrictions will be imposed in buffer areas. Moreover, the commitment to apply buffers to wetlands and streams is essentially meaningless because the boundaries of wetlands and streams on the Project site have apparently not been delineated and field-verified, nor shown on any map that can be relied upon by APA, Lyme's timber harvesters, or the public.

The Application is Inconsistent With the Purpose and Terms of the Easement

The State's conservation easement identifies the conservation objectives for the Project site, including conserving natural resources and protecting environmental and scenic values; adhering to sustainable forestry principles; maintaining soil productivity; protecting water quality; maintaining biodiversity; and providing for a broad distribution of forest age classes. *See* Easement § 5.1(1). The Project is incompatible with these objectives.

The Project fails to conform to these objectives because (i) it involves the clearcutting of hundreds of acres of forest on lands that include wetlands, vernal pools and intermittent streams; (ii) the applicant has failed to provide a natural resource inventory of the Project site; and (iii) the applicant has failed to provide any analysis of the potential impacts of the Project on ecologically sensitive areas of the Project site.

In addition, the Project fails to comply with several specific standards and criteria for forest management activities set forth in the conservation easement. *See* Easement § 5.1. Specifically, the application fails to identify how the Project adheres to sustainable forestry principles, will protect water quality, will maintain biodiversity, and ensure a broad distribution of forest age classes.

The conservation easement imposes requirements, conditions and data collection requirements in connection with forest management activities on the Project site. There is no evidence that the applicant has complied with those requirements. For example, the easement specifies that forest management activities must be conducted pursuant to either (i) a forest management plan approved by DEC, or (ii) pursuant to a certification from an independent forest certification program. Although no documentation of certification is included in the application, we understand that the applicant has been certified by an independent forest certification program and will be conducting the proposed timber harvest pursuant to option (ii). The easement requires that exercise of option (ii) is subject to the applicant having an independent audit conducted annually to confirm compliance with the certification program and promptly providing the audit to DEC. There is no

indication in the application that the applicant has complied with this obligation. The required annual audit is not included among the application materials made available by APA for review.

The application also fails to include the biological assessment required by the easement, thereby calling into question whether the required assessment has been completed. *See* Easement § 5.3(g). In any event, if completed, the biological assessment should have been included with the application materials because it would provide critical baseline ecological information about the Project site.

The Application Fails to Address Climate Change Impacts

The application includes no discussion whatsoever of the Project's climate change impacts, including the loss of forest biomass from clearcutting that will reduce ongoing carbon sequestration; the release of stored carbon from soils and vegetation as a result of clearcutting; and the inconsistency of widespread mature forest removal with long-term carbon storage goals.

In fact, the science is clear that clearcutting undermines carbon storage and sequestration by both reducing the amount of photosynthetic biomass capable of absorbing carbon dioxide and by releasing significant volumes of stored carbon into the atmosphere.[1] This result is completely incompatible with the recognition by Lyme in its application materials that climate change is having direct and indirect impacts on New York's forests and forest ecosystems.

Furthermore, the application fails to analyze or disclose the greenhouse gas (GHG) emissions associated with timber harvesting activities. The failure to address GHG emissions associated with the Project is also inconsistent with the Climate Leadership and Community Protection Act ("CLCPA"). The CLCPA requires all state agencies, including APA, when reviewing a permit application to determine whether such action "will be inconsistent with or will interfere with the attainment of the statewide [GHG] emission limits" established in Article 75 of the Environmental Conservation Law ("ECL"). Climate Leadership and Community Protection Act, Ch. 106, Laws of 2019, § 7(2). The APA must therefore evaluate whether the approval of this Project—including the proposed clearcutting of hundreds of acres—would be consistent with the GHG reduction targets established under the CLCPA. Because the Project has not included any assessment of its GHG impacts, approval at this stage would be premature and legally problematic.

Conclusion

PROTECT respectfully urges the APA staff to refer the Project to the full Agency Board for review. This Project is twice the size and scale of prior clearcutting applications of approximately 255 acres that were presented to the APA Board more than ten years ago in 2015. Additionally, the timber harvesting operations are no longer limited to winter months, which previously minimized impacts to wetlands, lowlands, streams, and soils prone to compaction or erosion. Timber harvesting operations are now taking place throughout the year due to a warming climate resulting climate change impacts to winter conditions. The climate change impacts include shorter or no periods of frozen ground, more thaws during winter, less snowpack, and more rain during winter

[1] Lacroix, Emily M.; Petrenko, Chelsea L.; Friedland, Andrew J. Evidence for Losses From Strongly Bound SOM Pools After Clear Cutting in a Northern Hardwood Forest. *Soil Science*, April 2016

months. Moreover, as noted above, this application contains no documentation that there is a current and valid certification and audit by the Forest Stewardship Council or Sustainable Forestry Initiative. Therefore, this application should be elevated to review by the Agency Board.

We request that the Agency Board deny the application because it contains multiple material omissions, deficiencies, and inaccuracies that make it impossible for the Agency to issue the statutory findings required for approval under the APA Act and APA regulations.

We believe that APA must fulfill its responsibility to ensure that timber harvesting activities in the Adirondack Park—particularly when taking place on lands subject to a State-owned Conservation Easement—are conducted in a manner that protects ecological integrity, complies with State laws and regulations, and advances—not undermines—New York's climate and conservation goals.

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on this proposed project.

Sincerely,



Christopher Amato
Conservation Director and Counsel

cc: Agency Board Members



NEW YORK STATE OF OPPORTUNITY. Adirondack Park Agency
RECEIVED
Date: November 2, 2026

October 30, 2026

Aaron Ziemann
Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977

Re. APA 2026-0202, Lyme Timber Co., Big Brook/Perkins Clearing Tract Clearcut

Dear Mr. Ziemann,

Adirondack Wild is concerned about the lack of detailed, mapped information about vulnerable aquatic resources within the proposed 500-acre shelterwood forest harvest in the town of Arietta. Moreover, we are concerned that the DEC conservation easement requirements that the landowner adequately map all aquatic resource information and minimize or mitigate negative impacts from forest management operations are not being sufficiently followed in this application.

As the application reveals, forest operations proposed overlap the headwaters of the Jessup River, with numerous perennial and intermittent streams and associated wetland features involved. The proposed logging operations parallel the rivers, streams, and wetland features for miles. Neither the application nor the Lyme Adirondack Forest Company (LAFCO) forest management plan provides the Agency or the public with confidence that these aquatic resources will remain unaffected by the forest operations, or that any resource damage will be minimized to the greatest extent possible.

Poorly Protected Riparian Management Zones (RMZ): The permit application states that “APA classified wetlands, a classified brook, and several permanent unclassified streams can be found throughout the stand. These RMZs will be buffered per the requirements of the LAFCO management plan to prevent water quality impacts.”

Unfortunately, when it comes to buffering of watercourses and associated “requirements” the LAFCO management plan itself is entirely vague and cannot serve to reassure the Agency that aquatic impacts will be minimized, much less prevented as stated.

For instance, the LAFCO management plan states on page 64 and throughout that the goal within Riparian Management Zones is to “minimize operation of machinery within the riparian zones and try to limit the number of repetitive trips on the same trail and try to minimize ground disturbance” (emphasis ours).

What specifically is the limit to the number of repetitive trips that will minimize ground disturbance within these sensitive Riparian Management Zones? The Agency and the public are left to guess what they are. Simply trying hard to minimize impacts to riparian zones should be an unacceptable standard at the Adirondack Park Agency.

As for the protection of the banks and waters of intermittent streams and brooks, the LAFCO management plan states merely that the forest operator "will use professional judgment to protect water quality on intermittent streams." Protection of all watercourses during this forest harvest, perennial or intermittent, should never be left to the forest operator to determine.

Inadequate Mapping: As for the application's inadequate mapping, the LAFCO management plan states that its GIS system identifies all hydraulic features and "locates all streams, ponds, vernal pools, wetlands, and seeps" (page 64).

If that is the case, then this application fails to show these features in any detail. The APA and the public are presented merely with a large-scale, colored, schematic picture of the proposed forest harvest areas. While streams and wetland boundaries are crudely shown, the map and application do not provide the locations of vernal pools, ponds, and seeps despite the LAFCO GIS system assurance (page 64 of the management plan) that all these wetland features are identified and mapped throughout Lyme's ownership.

Easement Requirements: Moreover, Lyme's DEC Sustainable Forestry Conservation Easement (2007) states on page 32 that "Grantors Forest Management Plan shall include maps showing… special treatment areas," identified in the easement as lakes, ponds, bogs, watercourses and wetlands, wild, scenic, or recreational rivers, and special habitats. To our knowledge, in this application the Agency lacks the easement's required, detailed, mapped information of aquatic resources and other special treatment areas to arrive at a permit determination.

Zero "no cut" zones: While LAFCO's management plan states that 100-foot RMZs must be flagged along 1st and 2nd order streams, wetlands, ponds, and vernal pools, the prescribed management plan within RMZs need only "consider" no-cut zones "in shallow or poorly drained soils" (page 66). Otherwise, operation of forest machinery needs only be minimized within the 100-foot RMZ.

By contrast, the DEC conservation easement contemplates that no forest management activity shall take place within the 100 ft. buffer subject to certain conditions (page 33). That should be an APA permit requirement as well. Minimum one-hundred-foot no-cut buffers ought to surround all wetlands and all riparian corridors, permanent and intermittent. To preserve their biotic integrity, identified vernal pools should receive 750 ft.no-cut buffers on all sides. All these features should be carefully mapped in the harvest layout and georeferenced for the timber harvesters.

Forest and Soil Carbon: An extensive clearcut like this, along with proposed scarification of the forest soil, can be expected to cause a substantial loss of soil nutrients in the short-term, and over the longer-term compromise forest stand carbon sequestration and storage. Under the Climate Leadership and Community Protection Act, the Agency must consider and account for the carbon impact of its permit decisions.

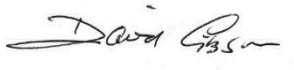
Timber Harvest Plan: Adirondack Wild is not objecting to the shelterwood clearcuts or clearcuts with reserves proposed in the application. As the landowner, and subject to adherence to its multiple conservation easements and certifications, Lyme has the right and the expertise to develop harvest plans.

Conclusions: However, the application's failure to map, buffer, and protect the harvest area's abundant watercourses and wetlands (RMZs in the application) violates the terms of the DEC conservation easement. Therefore, we respectfully ask Agency staff to recommend project denial without prejudice, and to bring this proposal before the full Agency for its review, and to schedule a public hearing.

The Big Brook/Perkins Clearing conservation easement land contains a wealth of sensitive aquatic resources. Given its professionalism and forest certifications, Lyme Timber is more than capable of ensuring that all aquatic resources are mapped, evaluated, and impacts buffered through the use of no-cut riparian zones.

Thank you for considering our comments.

Sincerely,



David Gibson
Managing Partner

Adirondack Wild: Friends of the Forest Preserve
P.O. Box 9247
Niskayuna, NY 12309
www.adirondackwild.org; 518-469-4081

Cc: John Burth, Regulatory Programs
Agency Members and Designees
Sean Ross, Lyme Timber

From: Jackie Bowen <JBowen@AdirondackCouncil.org>
Sent: Thursday, November 5, 2026 4:11 PM
To: APA Regulatory Programs Comments
Cc: Ziemann, Aaron C (APA)
Subject: Adk Council Comments on P2026-0202
Attachments: APA_P2026-0202 Lyme Timber Clearcut Request_Final.pdf

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Hi Aaron,

Attached are the Council's comments for P2026-0202. Please let me know if there are any issues opening the document.

Thank you,

Jackie

--
Jackie Bowen (she/her)
Director of Conservation
Cell: 518.429.9417
103 Hand Ave., #3 | PO Box D-2 | Elizabethtown, NY 12932
jbowen@adirondackcouncil.org | www.AdirondackCouncil.org

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★★★★ CHARITY NAVIGATOR
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November 5, 2026

New York State Adirondack Park Agency
Division of Regulatory Programs
Ray Brook, New York

Re: Lyme Timber Company Permit Application for Perkins Clearing Tract, P2026-0202

Dear Aaron Ziemann,

The Adirondack Council appreciates the opportunity to provide comments on permit 2026-0202 for a proposed 496-acre timber harvest on the Perkins Clearing Tract in the Town of Arietta, Hamilton County.

The Council recognizes the importance of responsible timber management to the Adirondack Park's working landscape and appreciates several elements of the proposed Timber Harvest Plan, including its commitment to winter harvesting and the retention of snags and den trees. Lyme Timber, with its Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC) certifications, is a leader in sustainable Adirondack forestry.

We also recognize that this proposal is intended primarily to release regeneration established through previous harvests, rather than establish an entirely new forest. The applicant reports substantial existing seedling and sapling populations in both treatment areas.

Nevertheless, the proposed removal of much of the existing overstory across nearly 500 acres represents a significant change in forest structure. The Agency should ensure that the project protects the ecological functions of the landscape, including soil health, water quality, wildlife habitat, carbon storage, and long-term forest diversity.

The Council offers the following recommendations and requests for additional safeguards.

1. Require genuinely frozen-ground harvesting conditions.
The Council supports the proposed winter harvest and recognizes that harvesting under frozen-ground conditions can substantially reduce soil compaction, rutting, erosion, and disturbance to sensitive forest soils. However, given increasingly warming and unpredictable winters, harvesting should be suspended during winter thaws or other periods when soils become vulnerable to compaction, rutting, or displacement of natural drainages.

These protections are important to maintaining soil structure, infiltration, biological activity, nutrient cycling, and the carbon-storage functions of temperate forests.

2. Strengthen protections for the Jessup River and associated tributaries.

The proposed harvest area contains APA-classified wetlands, a classified stream, multiple permanent and seasonal streams, and areas of wet ground. The Jessup River and its tributaries border a portion of the treatment area.

The Council is particularly concerned about potential sedimentation impacts to Jessup River tributaries that provide habitat for brook trout and other aquatic organisms sensitive to changes in water quality and stream substrate.

Although the applicant references its Riparian Management Zones and New York State Forestry Best Management Practices, the Agency should ensure that the protections are sufficiently detailed and enforceable.

3. Ensure that forest regeneration maintains ecological diversity.

The applicant identifies northern hardwood regeneration as a primary management objective and reports substantial existing regeneration across both treatment areas. However, the reported regeneration composition raises several questions that warrant additional consideration.

The harvest prescription calls for removal of all beech, basswood, and balsam fir, citing concerns including beech scale, poor form, and dieback. While we recognize the challenges posed by beech bark disease, the Agency should ask whether the applicant has distinguished between diseased trees and healthy or potentially disease-resistant beech.

We encourage the applicant to retain healthy, disease-resistant individuals where appropriate and to explain how the proposed removal of beech and other species will affect long-term forest composition and biodiversity.

4. Retain important wildlife habitat and forest structure.

The Council supports the applicant's commitment to retain all snag and den trees, as well as hemlock and elm for structural diversity and wildlife habitat.

Although the proposed treatments will substantially reduce overstory basal area, retaining these features will help maintain important habitat functions and structural diversity during forest regeneration.

The Agency should also ensure that sensitive ecological features, including vernal pools, are identified and protected before harvesting begins.

5. Require measurable post-harvest monitoring and adaptive management.

The applicant reports that previous shelterwood treatments successfully established substantial regeneration. The proposed harvest provides an opportunity to demonstrate that commercial timber management can achieve its silvicultural objectives while maintaining ecological integrity.

We encourage the Agency to require a monitoring plan that evaluates:

- Successful establishment and survival of desirable northern hardwood species.

- Regeneration composition and diversity.
- Deer-browse impacts.
- Soil disturbance, compaction, and rutting.
- Stream crossing restoration and erosion control effectiveness.
- Retention of designated wildlife habitat features.

Monitoring should occur at defined intervals following harvest, with corrective measures identified if regeneration objectives or environmental protections are not achieved.

Climate Leadership & Community Protection Act (CLCPA) Adherence
The CLCPA calls for agencies to consider how its actions, including permitting, support New York's climate goals. As we have for years, the Council calls on the Agency to consider how its permitting aligns with CLCPA goals; assuming the Adirondack Park Agency Act is stronger and fully addresses New York's climate goals is insufficient. The APA Act did not contemplate climate change when it was written over 50 years ago.

In conclusion, the Adirondack Council recognizes that commercial forestry and ecological stewardship can be compatible, and that private timberland owners have an important role in shaping the future of the Adirondack Park's working forests.

This project represents an opportunity to demonstrate that timber investment and forest management can advance commercial objectives while maintaining the ecological integrity and wild character of the Adirondack Park.

Thank you for your consideration.

Sincerely,



Jackie Bowen
Director of Conservation