



Memorandum in Opposition

Bill: S2647 by Senator Little
A2910 by Assembly member Stec

Title: AN ACT to amend the environmental conservation law, in relation to granting the office of parks, recreation and historic preservation the authority to operate the Camp Santanoni historic area, in the county of Essex

The Adirondack Mountain Club (ADK) Strongly Opposes this Legislation.

This legislation would transfer care, custody and control of the area of the Adirondack Forest Preserve known as *Camp Santanoni Historic Area* from the NYS Department of Environmental Conservation (DEC) to the NYS Office of Parks, Recreation and Historic Preservation (OPRHP).

This bill is unnecessary since the OPRHP currently works with DEC in interpreting Camp Santanoni's history and in sponsoring the designation of the site as a National Historic Landmark.

This bill does not recognize that OPRHP is legally unable to have sole custody of any historic site in the Forest Preserve because Environmental Conservation Law grants sole authority for the care, custody and control of the State's Forest Preserve to the NYS DEC. Sites can however be jointly administered by NYS DEC and OPRHP such as the John Brown Farm Historic Site in North Elba and Crown Point Historic Site in Crown Point. Further, the Adirondack Park State Land Master Plan (APSLMP) grants the implementation of the Plan's management guidance to the NYS DEC.

The bill conflicts directly with the provisions of Environmental Conservation Law section 9 – 0109, subsection 4 which govern how Camp Santanoni may be managed as a historic structure in the Adirondack Forest Preserve. This statute was expressly written to address Camp Santanoni and its historic structures.

There is simply no good policy or management reason to transfer Camp Santanoni to an agency with no legal authority to operate within the 2.7 million acre Adirondack Forest Preserve.

The Adirondack Mountain Club (ADK) Strongly Opposes this Legislation.