



October 15, 2015

Conservation

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Education

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Recreation

Since 1922

Kathy Regan
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Re: The Essex Chain Lakes Management Complex UMP (ECLMC UMP);

Dear Ms. Regan,

Thank you for the opportunity to comment on the Essex Chain Lakes Management Complex UMP and for all of the good planning work you and other Adirondack Park Agency and Department of Environmental Conservation employees have put into this UMP to both protect our Forest Preserve resource and to provide important recreational opportunities in this beautiful area.

Although there are many aspects of the plan that ADK fully supports, there are significant portions of the plan that are of great concern. We outline our concerns below.

Grandfathering Public Motorized Recreational Uses in WSRR Corridors

One of the most significant issues is the fact that the Polaris (Iron) Bridge is currently designated for motorized use in this UMP so that snowmobiles can access proposed trails in the Vanderwhacker Wild Forest. DEC relies on the zoning concept of grandfathering as set forth in ECL Article 15, Title 27, Section 15-2709 (2).

Grandfathering in relation to land use and zoning laws has only been interpreted to protect existing private property uses and property interests. Grandfathering cannot

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legally be used to authorize public use of motor vehicles across a bridge in a designated wild or scenic river corridor under the provisions of 6 NYCRR 666.13.

ADK disputes the following statement made by DEC on page 28 of the ECLMC UMP, “Motor vehicle access to the Polaris Bridge predates, and continued regularly, after the enactment of the WSRRS Act, therefore continued motor vehicle use on this road within the Scenic River Area is authorized by statute and regulation. The APA and DEC permits do not impose any conditions of future use or disposition of the bridge.”

ECL Article 15, Title 27, Section 15-2709 (2) states,

After inclusion of any river in the wild, scenic and recreational rivers system, no dam or other structure or improvement impeding the natural flow thereof shall be constructed on such river except as expressly authorized in paragraphs b and c of this subdivision.

Notwithstanding anything herein contained to the contrary, existing land uses within the respective classified river areas may continue, but may not be altered or expanded except as permitted by the respective classifications, unless the commissioner or agency orders the discontinuance of such existing land use. In the event any land use is so directed to be discontinued, adequate compensation therefor shall be paid by the state of New York either by agreement with the real property owner, or in accordance with condemnation proceedings thereon. The following land uses shall be allowed or prohibited within the exterior boundaries of designated river areas depending on the classification of such areas:

- b. In scenic river areas, the continuation of present agricultural practices, the propagation of crops, forest management pursuant to forest management standards duly promulgated by regulations, limited dispersed or cluster residential developments and stream improvement structures for fishery management purposes shall be permitted. **There shall be no mining, excavation, or construction of roads, except private roads necessary for residential, agricultural or forest management purposes,** and with the further exception that public access through new road construction may be allowed, provided that there is no other such access within two land miles in either direction.

Clearly, ECL Section 15-2709 (2) does not support the proposed alteration and expansion of use for a public snowmobile community connector trail across the Polaris Bridge and the designated Scenic river corridor and public motorized use of the Chain Lakes Road South through the designated Wild River corridor. The very description of “private” roads in 15-2709 (2) (b) shows that this section was intended to be applied to private lands through which run water bodies with a Scenic River designation. The language of this statute was clearly intended to grandfather only existing private property rights on the many miles of rivers covered by the WSR Act that flowed through private property. The statute and its legislative history make it clear that this section was never intended to be interpreted to use existing private property uses to grandfather new public motorized recreational uses after the state acquires private property. This is particularly true where these new public uses (snowmobiling) would be an alteration and expansion of the private uses. It is clear that allowing the Polaris bridge to carry the snowmobile and groomer traffic of community connector snowmobile trails would be both an alteration and an expansion of a private use.

ADK could find no evidence in the WSRR Act and its implementing regulations for DEC to make the legal decision that proof of grandfathering alone could be used to authorize public use of the Polaris Bridge or the South Chain Lakes Road. In fact the DEC official response to comments on the 1986 Draft Environmental Impact Statement for the WSRR regulations states much to the contrary. On page 57, DEC responds to a question about the need for a permit for using a bridge for motorized open space recreation by stating:

"Response - - The Regulations have been amended to prohibit motorized open space recreational uses in scenic river areas. Therefore bridges for this use have been prohibited." This response is repeated on page 59 in response to a question about all terrain vehicle use in a scenic river area. On page 58, the DEC response agrees that motorized recreational vehicles should not be allowed to operate in scenic river areas.

DEC does not disclose any historical or contemporary evidence upon which this determination is based. Logging and lease club use of the Polaris Bridge or the

South Chain Lakes Road by lessees and their invitees is not equivalent to general public recreational use that would support a grandfathering argument. Under section 9-0301 of the Environmental Conservation Law, the Forest Preserve should be forever maintained for the free use of the people. There is no evidence in the ECLMC UMP that either Finch Pruyn or its lease or snowmobile clubs permitted the general public to use the Polaris Bridge or the South Chain Lakes Road without being a paid member of an authorized club. In order to support a grandfathering of public recreational use today to avoid compliance with the provisions of the WSRR Act and its regulations, it is not sufficient to show that some people who joined a club and paid dues used the Polaris Bridge and the South Chain Lakes Road prior to the enactment of WSRR Act and its regulations. It must be shown that the general public could freely use the road without paying dues or any fee to do so.

ADK identified this legal issue as one that needed to be resolved in our December 10, 2013 Letter to the APA which states,

It is our understanding that DEC will endeavor to legally establish a history of grandfathered motorized uses so as to comply with ECL 15-2709 where the motorized recreational route passes through the ½ mile Wilderness set back in the vicinity of The Outer Gooley Club and the confluence of the Wild designated section of the Hudson River and the Indian River. In the event that the Eastern Chain Lakes road – Camp 6 snowmobile connector trail is not practical due to the foregoing legal issues, ADK believes the appropriate back up plan is the existing Cornell road conservation easement community connector trail between Indian Lake and Newcomb. We do not support the construction of the east-west “crossover” trail. Travel from Indian Lake to Newcomb via the Cornell road snowmobile route is 25 miles compared to the 30 miles if travelling by the Crossover trail and the Crossover route is barely 1 mile closer to the Polaris Bridge than the Cornell Road Western snowmobile connector trail.¹

In permit 91-200 for construction of the Polaris (Iron) bridge over the Hudson River issued by the APA in 1992, under Findings of Fact, Project Site description, the permit language states:

“other than access via the river, the site is not accessible by the general public.” (Page 3 of Permit 91-200)

The said permit also states that the purpose of the proposed bridge is to enable Finch Pruyn Company to harvest trees on the 1,775 acre parcel east of the Hudson River and also allow the applicant to better manage this parcel for recreational purposes, i.e., hunting/fishing club leases. The permit makes no reference to the bridge as facilitating recreational use by the general public for no such use existed. Under the express conditions of Project & Permit 91-200, Condition 2 states:

“No construction of buildings or expansion of existing buildings, subdivision of land, or other land use or development not expressly authorized by this permit may be undertaken without an additional Agency permit, amended permit or letter of non-jurisdiction pursuant to 9NYCRR Part 571.”

This Polaris bridge permit was issued after the enactment date of WSRR Act and its regulations. Given that the permit establishes that there was no public motorized recreational use of the proposed bridge at the time of the issuance of the permit, any snowmobile use by the general public and any snowmobile trail routing over the Polaris bridge would be a new use not authorized by the permit and such public snowmobile use of the Polaris bridge can't be “grandfathered” and cannot be authorized by DEC and the APA without an additional agency permit pursuant to condition “2” of the 1992 permit.

There can be no grandfathering of snowmobile use by the general public either by use of the Polaris bridge or use of community connector snowmobile trails in the scenic river corridor because grandfathering of an existing public use is neither authorized by ECL 15-2709 [2] or by the Executive Law section 816 and the provisions of the Adirondack Park State Land Master Plan (APSLMP). Under ECL Section 15-2721, any section of the state wild, scenic and recreational river system that is or shall become part of the Forest Preserve shall be subject to the laws and constitutional provisions under which these other areas (Adirondack Forest Preserve) may be administered, and in case of conflict between the provisions of those laws and the provisions of this title, the more restrictive provisions shall apply. The regulatory provisions of the WSRR prohibit motorized recreational use

of any bridge crossing a designated scenic section of river and the provisions of the APSLMP permit no grandfathering of previously existing private land uses or of any public use of State Forest Preserve.

The combination of the stricter portions of the WSRR Act and the APSLMP precludes any argument that pre-existing private use of snowmobiles of the Polaris bridge and the Scenic river corridor of the Hudson River is grandfathered where public motorized uses are expressly prohibited by the regulations of the WSRRS Act. See part E of 6 NYCRR 666.13.

In addition to the foregoing arguments, there can be no grandfathering of an existing land use after it is discontinued for one year. DEC cannot allege or establish an unbroken use by the general public of snowmobiles either before or after the enactment of the WSRRS Act and its regulations. Michael Carr of The Adirondack Nature Conservancy has informed me that there was no use of the Polaris Bridge by members of the general public during the over year period that The Nature Conservancy owned the Polaris bridge site. Thus, the continuous chain of an alleged public motorized recreational use of the Polaris Bridge cannot be established and no grandfathering can be alleged or legally established.

DEC has proposed community connector snowmobile trails using the Polaris Bridge and crossing the scenic designated corridor of the Hudson River. However, the definitions contained in Section 666.3 of the regulations of the WSRRS Act define a trail as follows:

“(III) Trail means a marked or maintained path or way four feet or less in width, and located and designed to provide reasonable access in a manner causing the least effect on the local environment.”

Thus Section 666.3 limits trail width to four feet which is less than one half the proposed width for community connector snowmobile trails, especially those groomed by tracked groomers. Moreover, it cannot be argued that the limited private use by Polaris Club members of snowmobiles complies with ECL 15-2709, Subdivision 2 so as to “grandfather” the proposed public community connector trails on the east side of the Polaris bridge. It is axiomatic that these high volume community connector routes maintained

by tracked groomers would be an expansion and alteration of the limited private snowmobile use of the Polaris bridge by Polaris Club members, especially where the new community connector trails are proposed for construction on the east side of the Hudson, traversing the designated scenic river corridor.

DEC invokes the language of Environmental Conservation Law (ECL) 15-2709, subsection 2 to justify its argument that alleged pre-existing private motor vehicle and snowmobile usage “grandfathers” new proposed public uses of motor vehicles and snowmobiles in wild and scenic designated river corridors, including bridge crossings, public motorized recreational uses which are prohibited under the provisions of 6NYCRR 666.13. Any court reviewing the meaning of ECL 15-2709(2) will place considerable weight on the intent of the draftsman of the Wild Scenic and Recreational Rivers Act – Peter S. Paine, Jr.

When Peter Paine was asked recently about whether ECL 15-2709 could be used to grandfather new public motorized recreational uses across a bridge in a designated wild or scenic river corridor or a snowmobile trail in the Forest Preserve through these corridors in violation of the regulations of the WSRR Act, he stated:

“I well remember the language in 15-2709 (2). I drafted this language following meetings held with representatives of the major forest products companies in the Adirondacks, notably Finch Pruyn who were concerned that the passage of the WSRR Act would eliminate existing uses within the designated river corridors. The grandfathering language was intended solely to apply to private lands within such corridors, which is reinforced by the reference to the payment of adequate compensation should the agency or the department order the discontinuation of existing land uses. In no way can this language be constructed as being applicable to state lands.” Private communication with Peter S. Paine, Jr., dated August 31, 2015.

Finally, the new snowmobile uses and community connector trails will be determined to be a greatly altered and expanded use well beyond the minimal private motorized uses which have occurred in the past in direct

conflict with ECL 15-2709 (2).

The Department of Environmental Conservation (DEC) must not allow motorized use of the Polaris (Iron) Bridge and should remove this temporary bridge which was installed by Finch Pruyn for logging in 1992. DEC's own regulations for the Wild, Scenic and Recreational Rivers Act prohibit the use of this bridge for motorized recreation because it is located in a Scenic River corridor.

Using the Polaris Bridge to permit snowmobiles to cross the Scenic River Area of the Hudson River would require a variance or change in Part 666 of Title 6 of 6 NYCRR 666.13[E][5][6] which now prohibits public motorized recreation uses of the Polaris Bridge in the said Hudson River Scenic Area.

The WSRR Act (and its implementing regulations found in Part 666 of Title 6) regulates the activities within the Scenic River Area. 6 NYCRR 666 does not authorize the use of the Polaris Bridge for public motorized recreation. A new public snowmobile trail over the Polaris Bridge would not be permissible under 6 NYCRR Part 666.13, Part E, the Table entitled "Roads, Trails, Bridges and Motorized Access." Using the Polaris Bridge for the proposed new Essex Chain Lakes Tract to Route 28N trail, would be a new public motorized recreational use of the Polaris Bridge. Since a new public motorized recreational use of the Polaris Bridge is not authorized in Part E of 6 NYCRR 666.13, it is presumed incompatible with the purposes of the WSRR Act and not permitted under 6 NYCRR 666.129(h). Accordingly, the ECLMC UMP cannot authorize the use of the Polaris Bridge for a new snowmobile trail originating in the Essex Chain Lakes Tract and connecting to the existing Route 28N community connector trail between Newcomb and Minerva.

Proposed Community Connector Snowmobile Trails East of the Hudson River

There is no justification for proposing community connector snowmobile trails across the Polaris Bridge into the Vanderwhacker Wild Forest. Proposal 1A (the preferred alternative) would require the construction of a new trail on the east side of the Hudson River running northeast into the hamlet of Newcomb. This proposed

trail is both redundant and unnecessary. There are existing snowmobile trails to connect Indian Lake and Newcomb on the west side of the Hudson River and DEC fails to thoroughly discuss these existing West of Hudson alternatives to constructing a new trail in a trailless area of the Vanderwhacker Wild Forest.

There is a similar problem with the proposed snowmobile community connector trail 1B which would cross the Polaris bridge and be cut and constructed to reach the Route 28N corridor via the Moose Pond Road. Again this trail is redundant and unnecessary. The Adirondack Park Agency approved a new community connector trail between Newcomb and Minerva using the Route 28N corridor at its July meeting. This trail obviates the need for trails through trailless areas of the Vanderwhacker Wild Forest. Use of the Polaris bridge for snowmobiles and construction of community connector snowmobile trails 1A and 1B would put motorized use too close to the defined Remote Interior areas in the Vanderwhacker Wild Forest. Proposed Community Connector Snowmobile Trails 1A and 1B would also necessitate an evaluation as to whether the amount of tree cutting would be "material" when considered with the cumulative, total amount of tree cutting anticipated to construct the whole Adirondack Forest Preserve Community Connector Snowmobile Trail as noted by State Supreme Court in the Seventh Mountain Snowmobile case. The mileage of these new trails will also figure in any calculation of a "material increase" in snowmobile trail mileage.

Further, both routes 1A and 1B that DEC proposed to cross the Polaris (Iron) Bridge have major construction and long-term maintenance issues. Either one of these proposed routes would also create a redundant snowmobile corridor because of the existing snowmobile route to the west of the Essex Chain Lakes Management Complex that utilizes the Cornell Road and connects Indian Lake to Newcomb and Minerva, and is described in the ECLMC UMP on pages 45 and 47. Unplowed town roads on the west side of the Hudson provide another route into Newcomb from the proposed Chain Lakes Road snowmobile trail connecting Indian Lake with Newcomb. Another option would be to construct a new crossover snowmobile trail in the Wild Forest Area south of Goodnow Flow would get snowmobiles from the Wild Forest Corridor to the existing snowmobile route that connects the Cornell road route to the west side of the hamlet of Newcomb.

Another significant issue that concerns ADK involves the Cedar River Bridge. DEC must ensure that the planning, implementation, and construction of this new resource complies with NYS Wild, Scenic, and Recreational Rivers Act (WSRRA) Regulations. DEC must follow the law in creating this new recreational resource in the Essex Chain Lakes Management Complex. Allowing snowmobiles to cross the Scenic River Area of the Cedar River on a new bridge would require a variance or change in Part 666 of Title 6 of 6 NYCRR 666.13[E][5][6] which now prohibits public motorized recreation uses of the said Cedar River Scenic Area and the use of a bridge to carry that public snowmobiling traffic.

Floatplanes

DEC fails to consider that the western half of Pine Lake falls within the wild river corridor of the Cedar River. The use in Wild River corridors of Floatplanes, as motorized vehicles, does not conform to the APSLMP or DEC's WSRR Act regulations. DEC must also not allow floatplanes within the Wild River corridor to dock and drop customers at campsites.

Floatplane use on First and Pine Lakes violates several provisions of the ECL. DEC must extinguish the floatplane easements if current floatplane operators stop using First and Pine Lake and remove all docks, personal property and debris at the any primitive campsites used by floatplanes.

The ECLMC UMP proposes to continue floatplane landings on First and Pine Lakes and to retain three floatplane tent sites (two on First, and one on Pine) that will each be brought into compliance to the APSLMP and “reserved for floatplane users only.” The proposed floatplane tent site on Pine Lake and one of the two sites on First Lake are located in the western halves of these two lakes where no deeded rights exist because The Nature Conservancy did not own the property, the western halves of these lakes have been and are Forest Preserve lands. All waters of First Lake and Pine Lake were classified Primitive by the Adirondack Park Agency on December 13, 2013. Primitive lands must be “managed as close to wilderness as possible under the Primitive Area Management guidelines of the APSLMP.

Accordingly, floatplane docking at designated campsites can only occur where TNC deed permits that activity on eastern halves of those lakes. The western half of Pine Lake is located within a section of the Cedar River corridor that is designated as

“Wild”. Accordingly, floatplane accessible campsites should only be sited on the eastern halves of First and Pine Lakes. The western shore of these lakes should be managed as Primitive by Wilderness standards. ADK asserts that the Forest Preserve shall be reserved and maintained for the free use of all people (See section 9-0301(i) of the ECL). By virtue of this section, DEC does not have the legal authority to give private floatplane commercial owners the exclusive use of these three campsites in perpetuity. These campsites are not retained private inholdings under TNC deed, at best TNC deed grants floatplane landing rights.

Outer Gooley Farmhouse

DEC must not retain and authorize use of the Outer Gooley Farmhouse as a privately run facility for a “hut-to-hut ski/snowmobile/equestrian touring system.” This would be a violation of Article XIV, section 1 of the state Constitution. DEC must not revisit the situation proposed by the 1932 “Closed Cabin” Constitutional Amendment.

The ECLMC UMP proposes retention of the Outer Gooley Club farmhouse in the designated Wild River area alleging its historic importance. DEC’s FEIS on its WSRRS regulation states that such retention would require a finding that this building is a “major cultural resource” (FEIS page 26), and a new statute would need to be enacted excluding the farmhouse or changing the regulations, specifically 6 NYCRR 666.7

DEC has not set forth any proposed use of this farmhouse. Retention of the Outer Gooley Club farmhouse would not comply with the current provisions of ECL 9-0109 without more information and consistent determinations.

Use of Non Natural Materials Cedar River Bridge

The plan proposes a bridge over the Cedar River to be constructed of non-natural materials. While we understand the Adirondack Park Agency now recognizes that the use of steel cables is permissible as fasteners and anchor components, the use of other steel components such as steel trusses or I-beams will require an amendment of the APSLMP.

Bicycle Use

ADK supports bicycle riding opportunities on trails designated on former all season roads in the Essex Chain Lakes Primitive Area. These bicycle trails on former all season roads should not be maintained by motor vehicles. See Page 26 of the Adirondack Park State Land Master Plan. In the meantime, ADK supports the use

of bicycles on roads currently being used by lease club members for motor vehicle access until that use is ended in 2018. ADK could support an amendment to the APSLMP specific to the Essex Chain Lakes Primitive Area, if judged necessary, to locate bicycle trails on certain of those former all season roads. Mountain bike trails should be located on adjacent lands of the Blue Mountain Wild Forest.

Fisheries - ADK believes that public fishing should be catch and release. See, p.36

Motorized Seasonal Access

We are disappointed that DEC has decided to extend public motorized access seasonally into the interior of the Essex Chain Lakes Tract along the north-south Wild Forest Corridor, on the Camp 6 road in the north, and along the Chain Lakes Road (south). This plan is contrary to the preferred alternative adopted by the APA that identified a Wild Forest Corridor which clearly planned for the potential winter-use of snowmobiles only (in terms of motorized recreation). Opening this corridor for cars and trucks or other motorized vehicles is contrary to stakeholder negotiations, and the APA process that classified the Wild Forest Corridor for potential winter use by snowmobiles. On pages 2 and 3 in the context of a Wild Forest Corridor along the Chain Lakes Road South and the Camp 6 Road, the *Resolution Adopted by the Adirondack Park Agency with Respect to 2013 Classification Package* the APA lists specifically the uses of “hunting, horse and wagon riding, All-Terrain Bicycling, snowmobiling.” The APA resolution does not list the use of vehicles and trucks as permissible along the Wild Forest Corridor. Extending motorized use for cars and trucks or other motorized vehicles along these corridors will create an unacceptable impact on other forms of recreation in the Essex Chain Lakes and on the adjacent Wilderness and Primitive Areas. We respectfully request that DEC remove this unacceptable extension of motorized vehicle use from the ECLMC UMP.

Universal Access

The Resolution Adopted by the Adirondack Park Agency with Respect to 2013 Classification Package, states on page 6 that The “Wild Forest access along the Boots to Cornell Road to the south shore of Fifth Lake will be possible for the purpose of Universal Access only.”² This statement is clarified on page 7 of Attachment D of the Resolution, the State Land Master Plan Area Description,

which states, “Wild Forest access along the Boots-to-Cornell Road, and then to the south shore of Fifth Lake was established for the sole purpose of providing access to persons with disabilities.”³ ‘*Persons with disabilities*’ refers to DEC’s C-P3 Program.⁴ This successful program allows those with disabilities to access areas that they would otherwise be unable to enjoy. DEC describes the CP3 program on their web site explaining the use of a TRP for those participating in CP3,

The MAPPWD permit is a temporary revocable permit (TRP) that provides motor vehicle access to certain state lands administered by DEC. MAPPWD permit holders are permitted uncommon access to activities such as hunting, fishing, camping and wildlife observation. The permit is only issued to qualified people with disabilities, who must complete and submit the application linked below.

Permit holders can use a permitted vehicle to travel beyond the reach of public roads, to areas where others must hike or bike. The permit provides access for those who seek solitude, connection to nature, undisturbed wildlife habitat, and inclusion with fellow sportspeople.

MAPPWD Routes have been carefully selected in order to protect natural areas and recreational activities.⁵


In the ECLMC UMP, DEC’s reference on page 25 to “Universal Access” for the general public and the use of a second parking lot near the lot designated for those with a CP3 permit for use by the general public is intentionally opaque and attempts to confuse readers regarding the concept of Universal Access. It also undermines the excellent CP3 program by destroying the goal of the program which is uncommon access for people with disabilities who may be seeking “...solitude, connection to nature, undisturbed wildlife habitat, and inclusion with fellow sportspeople.”⁶ There may be other ways to enhance the ECLMC UMP with universal access opportunities, but certainly compromising the experience that persons with disabilities may seek on the Essex Chain Lakes by siting a general public parking area near CP3 site to access the same resource features is definitely not one of those ways. Further, the addition of two adjacent parking areas in the middle of the sensitive Essex Chain Lakes ecosystem is certainly not in the best interest of the resource.

Conclusion

ADK submits these comments on the conformity of the ECLMC UMP with the Adirondack Park State Land Master Plan and the Wild, Scenic and Recreational Rivers Act as they are read and interpreted together as required by law.

Thank you for the opportunity to submit these comments.

Respectfully submitted,

A rectangular box containing a handwritten signature in cursive script that reads "Neil F. Woodworth".

Neil F. Woodworth

Executive Director and Counsel

Adirondack Mountain Club, Albany Office

The Adirondack Mountain Club (ADK) is dedicated to the protection and responsible recreational use of the New York State Forest Preserve, and other parks, wild lands, and waters vital to our members and chapters. The Adirondack Mountain Club (ADK) founded in 1922, is a member-directed organization committed to public service and stewardship. ADK employs a balanced approach to outdoor recreation, advocacy, environmental education, and natural resource conservation. The Adirondack Mountain Club's 30,000 members enjoy hiking, canoeing, kayaking, cross-country skiing, camping, backpacking, biking, mountaineering, snowshoeing, and other "muscle-powered" outdoor activities. Our members are committed to protecting the places they play in, volunteering countless hours to advance ADK's mission of protecting natural resources and promoting responsible recreation

¹ ADK December 10 Letter to APA (p. 7)

² Resolution Adopted by the Adirondack Park Agency with Respect to 2013 Classification Package, Attachment A, Description of

² Resolution Adopted by the Adirondack Park Agency with Respect to 2013 Classification Package, Attachment A, Description of Action (p. 6)

<http://apa.ny.gov/Mailing/2013/12/StateLand/2013%20Finch%20Resolution%20With%20Attachments.pdf>

³ Resolution Adopted by the Adirondack Park Agency with Respect to 2013 Classification Package, Attachment D, APSLMP Area Descriptions (Comparison Showing Changes From October 2011) (p. 3)

⁴ <http://www.dec.ny.gov/outdoor/2574.html>

⁵ <http://www.dec.ny.gov/outdoor/2574.html>

⁶ <http://www.dec.ny.gov/outdoor/2574.html>