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RE: Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FNSI) for the potential of environmental impacts of increasing mission and training activities (high intensity, multi-day training events) at Fort Drum Army Installation and within the Local Flying Area (LFA) of Fort Drum.

To whom it may concern,

Thank you for the opportunity to comment on the Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FNSI) for the proposed action to increase the air and land based training activities conducted by the 10th Combat Aviation Brigade and the 10th Sustainment Brigade including in the training areas located in the following nine counties Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, and St. Lawrence (excluding all Sovereign Nation Indian Lands).

We respectfully request that you consider the following concerns and comments outlined below.

The Finding of No Significant Impact (FNSI) is flawed and must be rescinded. This proposed action requires a full Environmental Impact Statement (EIS). The proposed action will impact public lands and communities within the Fort Drum Local Flying Area (LFA) significantly as defined by 40 CFR § 1508.27.

The Action Will Impact Public Lands

The PEA and Draft FNSI state that “*Fort Drum’s intent is to prioritize the use of public lands* [emphasis added].” (p. FNSI-ii). We hereby incorporate by reference the New York State Unit Management Plans and website pages for public lands and conservation easements (CE) in the LFA that will be impacted by the proposed action, including the Adirondack Foothills Management Unit,¹ 46-Corners Management Unit,² Aldrich Pond Wild Forest,³ Alger Island Campground,⁴ Black River Wild Forest,⁵ Blue Mountain Wild Forest,⁶ Blue Ridge Wilderness,⁷ Bog River Complex,⁸ St Lawrence Flatlands Management Unit,⁹ Brown Tract Pond Campground,¹⁰ Camp Santanoni Historic Area,¹¹ Cedarlands Conservation Easement,¹² Conifer-Emporium CE,¹³ Cranberry Lake Complex,¹⁴ Croghan Tract CE,¹⁵ Crown Point

Reservation,¹⁶ East Branch Fish Creek North Conservation Easement Tract,¹⁷ Eastern Lake Ontario Unit,¹⁸ Eighth Lake Campground,¹⁹ Essex Chain Lakes Management Complex,²⁰ Ferris Lake Wild Forest (and Oxbow Conservation Easement),²¹ Fish Creek Pond Campground and Day Use Area,²² Fish Creek State Forest,²³ Five Ponds Wilderness,²⁴ Forked Lake Campground and Day Use Area,²⁵ Fourth Lake Day Use Area,²⁶ Fulton Chain Wild Forest,²⁷ Giant Mountain Wilderness,²⁸ Golden Beach Campground and Day Use Area,²⁹ Gore Mountain Ski Area,³⁰ Grass River Wild Forest and Complex,³¹ Ha-De-Ron-Dah Wilderness,³² Hammond Pond Wild Forest,³³ High Peaks Wilderness,³⁴ Hill and Hollow Unit,³⁵ Hinkley Reservoir Day Use Area,³⁶ Hoffman Notch Wilderness,³⁷ Horicon Boat Launch,³⁸ Hudson Gorge Wilderness,³⁹ Hurricane Mountain Wilderness,⁴⁰ Independence River Wild Forest,⁴¹ Indian Lake Islands Campground and Day Use Area,⁴² Jay Mountain Wilderness,⁴³ Jessup River Wild Forest,⁴⁴ Lake Champlain Islands,⁴⁵ Lake Durant Campground,⁴⁶ Lake Eaton Campground,⁴⁷ Lake Harris Campground and Day Use Area,⁴⁸ Lewey Lake Campground and Day Use Area,⁴⁹ Limekiln Lake Campground and Day Use Area,⁵⁰ Lincoln Pond Campground and Day Use Area,⁵¹ Little Sand Point (Piseco Lake) Campground,⁵² Meadowbrook Campground and Day Use Area,⁵³ Mohawk Vista Unit,⁵⁴ Moffit Beach Campground and Day Use Area,⁵⁵ Moose River Plains Wild Forest,⁵⁶ Mount Van Hoevenberg Olympic Sports Complex,⁵⁷ Nicks Lake Campground and Day Use Area,⁵⁸ Northampton Beach Day Use and Campground Area,⁵⁹ Oneida Hills Management Unit,⁶⁰ Onondaga Unit,⁶¹ Oswegatchie CE,⁶² Paradox Lake Campground and Day Use Area,⁶³ Pepperbox Wilderness,⁶⁴ Pharaoh Lake Wilderness,⁶⁵ Pigeon Lake Wilderness,⁶⁶ Point Comfort Campground and Poplar Point Day Use Area,⁶⁷ Putnam Pond Campground and Day Use Area,⁶⁸ Raquette Boreal Unit,⁶⁹ Remsin Lake Placid Travel Corridor,⁷⁰ Rollins Pond Campground,⁷¹ St Regis Canoe Area,⁷² St Regis Mountain Fire Tower Historic Area,⁷³ Salmon River Falls Unique Area,⁷⁴ Saranac Lake Islands Campground and Day Use Area,⁷⁵ Saranac Lakes Wild Forest,⁷⁶ Scaroon Manor Campground,⁷⁷ Second Pond Boat Launch,⁷⁸ Sentinel Range Wilderness,⁷⁹ Sharp Bridge Campground and Day Use Area,⁸⁰ Siamese Ponds Wilderness,⁸¹ Silver Lake Wilderness,⁸² Split Rock Mountain Wild Forest,⁸³ St Lawrence Flatlands Management Unit,⁸⁴ St Lawrence Foothills Management Unit,⁸⁵ St Lawrence Rock Ridge Management Unit,⁸⁶ Taylor Pond and Management Complex,⁸⁷ Tioga Point Campground,⁸⁸ Tug Hill North Unit,⁸⁹ Tug Hill East Unit,⁹⁰ Upper Hudson Woodlands,⁹¹ Upper Salmon River Unit,⁹² Vanderwhacker Wild Forest (and Hysop Tract CE and Blue Ridge Tract CE),⁹³ Vienna Woods Unit,⁹⁴ Watson's East Triangle Complex,⁹⁵ Westward Waters Unit,⁹⁶ Whiteface Mountain Ski Center,⁹⁷ Wilcox Lake Wild Forest,⁹⁸ William C Whitney Wilderness,⁹⁹ Wilmington Notch Campground and Day Use Area,¹⁰⁰ Wilmington Wild Forest,¹⁰¹

Impacts to the Economy

The 9-county area that is described as the Fort Drum's LFA, which contains hundreds of thousands of acres of the Adirondack Park, is comprised of communities whose economy depends on outdoor recreation tourism. Since winter sports are still viable in the Adirondacks, the tourism season extends throughout the year. Table 2-2 on p. 16 (and throughout the

document thereafter) provides only for avoiding public lands during hunting, fishing, and boating seasons, but completely ignores hiking, running, camping, swimming, paddling, birdwatching, snowshoeing, climbing, skiing, equestrian use, and biking, among other important outdoor recreation activities that occur in the LFA. These important recreational activities must be considered and public lands must be avoided to protect the quality of these recreational experiences.

Alternative 1 of the proposed action calls for up to six 14-day trainings “plus a seven-day period to return the property to its condition prior to the exercise,” which makes a full training event 21 days. **Alternative 1 of the proposed action would result in direct impact for 126 days (or over four full months) of military activity on public lands every year with 60 training events in a 10-year period.** There are hundreds of thousands of acres of Forest Preserve and conservation easements lands in the Adirondack Park in the 9-county area of the LFA which would be impacted by low-flying aircraft during these trainings. Further, each event would cause significant impact to multiple sites on the ground and on the roads between sites (for mechanized, infantry, support, and combat aviation assets, as well as sustainment sites). The predicted damage of the sites is such that seven days are proposed in the action to mitigate the impacts of the military activity on the public lands used for each training. This level of activity would significantly impact the quality of outdoor recreation experiences in the LFA and subsequently would impact the tourism dependent economy of the Adirondack Park.

Failure to Provide the Public with Necessary Information

Although the PEA and Draft FNSI clearly indicate that the intent is to prioritize public lands, there is no map or illustration provided showing the public lands or conservation easement lands that may be impacted given the criteria that have been established in Table ES-1 (p. ES-iv) and the identified geographic area of the LFA. Producing a map using GIS layers of the identified criteria within the LFA geographic region would illustrate for the public the areas available for trainings and the public lands that would be targeted for the proposed action. The failure to provide a map of the areas that would be targeted by this action does not give the public the necessary information to supply site-specific comments on the action. Valuable data relevant to this process such as the identification of culturally or environmentally sensitive areas by the public, local government, or the jurisdictional agencies that manage and protect areas within the LFA will therefore not be incorporated into planning for the proposed action.

Segmentation

The failure to provide a map of all of the areas that will be impacted by the proposed action given the known criteria and known geographic location of the proposed action also indicates an attempt to segment this action to avoid a determination of significance. The PEA avoids showing the impacted area as a whole and intends to analyze specific training sites in the future through tiering on a site by site basis. NEPA prohibits this kind of segmentation:

“Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.” 40 CFR § 1508.27(b)(7)

By waiting to identify the areas impacted by the 60 training events (during a 10-year period) proposed in Alternative 1,¹⁰² the cumulative impacts of the proposed action will not be clearly analyzed or incorporated into the alternatives and the decision to be made.

Tiering Used Inappropriately

Tiering to an Environmental Assessment (the PEA), as is proposed, is not appropriate. According to 40 CFR § 1508.28,¹⁰³ tiering is appropriately used when future environmental reviews are tiered to an Environmental Impact Statement (EIS), not an Environmental Assessment (EA).¹⁰⁴

Section 1508.28 states,

Tiering refers to the coverage of general matters in broader environmental impact statements (such as national program or policy statements) with subsequent narrower statements or environmental analyses (such as regional or basinwide program statements or ultimately site-specific statements) incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared.

(a) From a program, plan, or policy environmental impact statement to a program, plan, or policy statement or analysis of lesser scope or to a site-specific statement or analysis.

(b) From an environmental impact statement on a specific action at an early stage (such as need and site selection) to a supplement (which is preferred) or a subsequent statement or analysis at a later stage (such as environmental mitigation). Tiering in such cases is appropriate when it helps the lead agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe.

If tiering will be used for future site-specific reviews, an EIS must be used for the proposed action at this stage of the decision to be made.

Stakeholders not Consulted.

Although the Department of Environmental Conservation (DEC) is listed as a stakeholder, the Adirondack Park Agency (APA) was not consulted and is not listed as a stakeholder. The APA has jurisdiction over wetlands in the Adirondack Park and must be identified as a jurisdictional entity and consulted as a stakeholder in this NEPA process.

Current Status and Alternatives Not Clearly Defined

Alternative 3 is defined as the current condition. This alternative should include a description of the prior action and decision in which both DEC and APA participated as stakeholders. The background section of the PEA explains that currently there are one or two 14 day exercises each year, but this is not clearly described under Alternative 3, which only states that there would be “no changes to the amount of current training exercises at Fort Drum.”

Without information about the amount and type of current training exercises at Fort Drum described under Alternative 3 it is difficult to fully evaluate any of the alternatives. Further, it is unclear how Alternative 3 differs from Alternative 2. Alternative 2 also proposes two training events each year, which according to the background section is the current condition (Alternative 3). Failure to provide a clear description of Alternative 3 obfuscates the amount of increase in the intensity of the action.

Further, the description of Alternative 2 on page 15 describes two events per year, while the description on page 28 of Alternative 2 suggests there may be four events per year, “training exercises would include up to two high-level training exercises up to two times a year on- and off-post.” This ambiguity in the description of Alternative 2 also suggests that the number of events may be higher than 6 in Alternative 1. The lack of clarity makes it impossible for the public to provide fully informed comments.

Failure to Hold a Public Information Session

We certainly understand that processes and structures have needed to change in order to deal with the challenges of a global pandemic during the COVID crisis; however, using COVID as an excuse to not hold an informational meeting is very disappointing. Organizations, businesses,

and governments across the globe have been using a variety of tools (e.g., zoom, webex, youtube, and facebook live events) in lieu of in-person meetings. These measures have been very successful and have in many instances improved outreach and public interaction.

National Register of Historic Properties

Table FNSI-1 on p. FSNI-iii states in the criteria for selecting exercise locations that properties and sites listed on the National Register of Historic Properties will be avoided. The Adirondack Park is listed in the National Register of Historic Properties and must be avoided in the proposed action.¹⁰⁵ Although the listing indicates that the site is located in Essex County (the location of the Adirondack Park Agency), the full National Register listing includes the entire Adirondack Park.¹⁰⁶

Significant Impact of the Proposed Action

The proposed action will have a significant impact on the *human environment*.¹⁰⁷ Table FNSI-2 on p. FNSI iv repeatedly uses the terms short-term and temporary in describing impacts to land, soils, biological resources, water resources, socioeconomic and environmental justice, transportation and traffic, public health and safety, and impacts from noise. The false assumption made in the FNSI and PEA is that the proposed action will not cause significant impact to the human environment because the actions are temporary. However, 40 CFR § 1508.27 (b) (7) explains that when determining the significance of the impact of an action, “significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.”¹⁰⁸

Although the training events may be temporary, they will be repeated many times such that the cumulative impacts of this action during a 10-year period will include impacts from 60 training events multiplied by all of the flights over public lands and communities during those events and 60 training events multiplied by all of the land-based sites needed for each training including the locations for mechanized, infantry, support, and combat aviation assets as well as sustainment sites. **In Alternative 1, for example, there will be direct impact for 126 days (or over four full months) of military activity on public lands every year.** The intensity of the proposed action will impact the affected region¹⁰⁹ of the LFA and the affected interests¹¹⁰ of the region including the regional economy which is highly dependent on year-round outdoor recreation. These impacts will be cumulative.

When determining the significance of the impact of a proposed action¹¹¹ other important considerations include the “...degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places...” (40 CFR § 1508.27 (b)(8)). As discussed above, the Adirondack Park is listed in the National Register of Historic Places which also makes the impact of the proposed action significant.

Additionally, the proposed action has a significant impact on the human environment because the action will be impacting unique characteristics in the LFA including historic resources, park lands, prime farmlands, wetlands, wild and scenic rivers, and ecologically critical areas (40 CFR § 1508.27 (b)(3)); the action is also controversial (40 CFR § 1508.27 (b)(4)) which increases the weight of the impact of this action.

Given the concerns stated above we respectfully request that the FNSI be rescinded and that the US Army at Fort Drum prepare a full EIS for the proposed action.

Sincerely,

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Adirondack Mountain Club

ADK is dedicated to protecting and advocating for New York State’s wild lands and waters while also teaching people how to enjoy natural places responsibly. Since 1922, the organization has offered people opportunities to stay and play in as well as protect, discover, and explore the outdoors. Today, ADK has 30,000 members in 27 chapters statewide and is served by a professional, year-round staff. The organization is recognized as a vital voice in the commitment to environmental stewardship and ethical outdoor recreation in New York State.

ADK members hike, camp, snowshoe, cross-country ski, paddle, and cycle the lands and waters of the Adirondack Park and other state lands. Our members are also monitors and maintainers of trails and recreation infrastructure as well as watchdogs of public lands and watersheds to monitor for invasive species or irresponsible and destructive motorized trespass.

¹ <https://www.dec.ny.gov/lands/97049.html>
https://www.dec.ny.gov/docs/regions_pdf/adkfhilldraft3.pdf

² <https://www.dec.ny.gov/lands/44921.html>
https://www.dec.ny.gov/docs/regions_pdf/46cornerstxt.pdf
³ <https://www.dec.ny.gov/lands/75315.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/aldrich.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/aldrchamend1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/aldrchamend2.pdf

⁴ <https://www.dec.ny.gov/outdoor/24451.html#ump>
https://www.dec.ny.gov/docs/permits_ej_operations_pdf/algerump.pdf
⁵ <https://www.dec.ny.gov/lands/75310.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/brump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/aldrchamend1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/brwfamend2.pdf

⁶ <https://www.dec.ny.gov/lands/101641.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/bluemt.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/bmwfumpamend.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/bmwfumpamend2.pdf

⁷ <https://www.dec.ny.gov/lands/22608.html>
https://www.dec.ny.gov/docs/lands_forests_pdf/brwafullplan.pdf
<https://www.dec.ny.gov/lands/100449.html>

⁸ <https://www.dec.ny.gov/lands/75295.html#Manage>
https://www.dec.ny.gov/docs/lands_forests_pdf/bogrriver.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/bogamend409.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/bogumpamend.pdf

⁹ <https://www.dec.ny.gov/lands/22578.html>
Bombay and Brasher State Forests <https://www.dec.ny.gov/lands/7999.html>
Buckton State Forests <https://www.dec.ny.gov/lands/80851.html>
Fort Jackson State Forest <https://www.dec.ny.gov/lands/80856.html>
Knapp Station State Forest <https://www.dec.ny.gov/lands/80861.html>
Lost Nation State Forest <https://www.dec.ny.gov/lands/80872.html>
Raymondville State Forest <https://www.dec.ny.gov/lands/80835.html>
Sodom State Forest <https://www.dec.ny.gov/lands/81591.html>
Southville State Forest <https://www.dec.ny.gov/lands/81237.html>
Detached Forest Preserve Parcels (436 acres)

¹⁰ https://www.dec.ny.gov/docs/permits_ej_operations_pdf/browntractfinalump.pdf
<https://www.dec.ny.gov/outdoor/24456.html>

¹¹ <https://www.dec.ny.gov/lands/53095.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/santanonump1.pdf

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- ¹² <https://www.dec.ny.gov/lands/108144.html>
https://www.dec.ny.gov/docs/lands_forests_pdf/cedarlandsfinalrmp.pdf
- ¹³ <https://www.dec.ny.gov/lands/34715.html#Planning>
- ¹⁴ <https://www.dec.ny.gov/lands/34715.html#Planning>
Cranberry Lake Wild Forest https://www.dec.ny.gov/docs/lands_forests_pdf/cranberryump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/fcwfumpamen1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/crandraft.pdf
Cranberry Lake Campground https://www.dec.ny.gov/docs/permits_ej_operations_pdf/cranberryfinalump.pdf
Cranberry Lake Boat Launch https://www.dec.ny.gov/docs/lands_forests_pdf/clblumpamend1.pdf
- ¹⁵ <https://www.dec.ny.gov/lands/8086.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/croghandrafttrmp.pdf
- ¹⁶ <https://www.dec.ny.gov/lands/78011.html>
Crown Point Campground <https://www.dec.ny.gov/outdoor/24461.html>
Crown Point Historic Site <https://parks.ny.gov/historic-sites/34/details.aspx>
- ¹⁷ <https://www.dec.ny.gov/lands/7991.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/ebfcrmp.pdf
- ¹⁸ <https://www.dec.ny.gov/lands/90727.html>
https://www.dec.ny.gov/docs/regions_pdf/elodraftump.pdf
- ¹⁹ https://www.dec.ny.gov/docs/permits_ej_operations_pdf/eighthlakefinalump.pdf
<https://www.dec.ny.gov/outdoor/24465.html#ump>
- ²⁰ <https://www.dec.ny.gov/lands/91888.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/eclmplan.pdf
- ²¹ <https://www.dec.ny.gov/lands/114279.html#Planning>
- ²² <https://www.dec.ny.gov/outdoor/24466.html#ump>
- ²³ <https://www.dec.ny.gov/lands/109297.html>
Kasoag State Forest <https://www.dec.ny.gov/lands/63170.html>
Klondike State Forest <https://www.dec.ny.gov/lands/63195.html>
Orton Hollow State Forest <https://www.dec.ny.gov/lands/63334.html>
Stone Hill State Forest <https://www.dec.ny.gov/lands/63951.html>
- ²⁴ <https://www.dec.ny.gov/lands/34719.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/fivepondsump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/fpwamend1.pdf
- ²⁵ <https://www.dec.ny.gov/outdoor/24467.html#ump>
- ²⁶ https://www.dec.ny.gov/docs/permits_ej_operations_pdf/algerump.pdf
<https://www.dec.ny.gov/outdoor/24451.html#Planning>
- ²⁷ <https://www.dec.ny.gov/lands/75305.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/fcwfump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/fcwfumpamen1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/fcwfumpamen2.pdf
- ²⁸ <https://www.dec.ny.gov/lands/100750.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/giant1.pdf
- ²⁹ <https://www.dec.ny.gov/outdoor/24468.html#ump>
- ³⁰ <https://www.dec.ny.gov/lands/41866.html>
https://www.dec.ny.gov/docs/lands_forests_pdf/gore2002ump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/gore2002eis.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/gore20182.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/gore2018ump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/gore2005ump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/gore2008sies.pdf
³¹ <https://www.dec.ny.gov/lands/75300.html#Planning>
Grass River Wild Forest https://www.dec.ny.gov/docs/lands_forests_pdf/gwfwump.pdf
Grass River Conservation Easement https://www.dec.ny.gov/docs/lands_forests_pdf/grassriverfinalrmp.pdf
Tooley Pond Conservation Easement https://www.dec.ny.gov/docs/lands_forests_pdf/tooleypondfinalrmp.pdf
Long Pond Conservation Easement https://www.dec.ny.gov/docs/lands_forests_pdf/longpondrmp.pdf
³² <https://www.dec.ny.gov/lands/91261.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/hdrump.pdf
³³ <https://www.dec.ny.gov/lands/109807.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/hpwfump2.pdf
³⁴ <https://www.dec.ny.gov/lands/28320.html>
https://www.dec.ny.gov/docs/lands_forests_pdf/hpwump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/hpwaamend1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/hpwcumpamend.pdf
³⁵ <https://www.dec.ny.gov/lands/88866.html>
https://www.dec.ny.gov/docs/regions_pdf/hhumpfinal.pdf
³⁶ <https://www.dec.ny.gov/outdoor/113214.html#Planning>
³⁷ <https://www.dec.ny.gov/lands/81598.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/hoffmanump.pdf
³⁸ <https://www.dec.ny.gov/lands/53165.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/horiconump.pdf
³⁹ <https://www.dec.ny.gov/lands/101210.html#Planning>
⁴⁰ <https://www.dec.ny.gov/lands/100895.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/hmpaump.pdf
⁴¹ <https://www.dec.ny.gov/lands/58192.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/irwfump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/irwfamend3.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/irwfamend4.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/irwfamend5.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/aldrchamend1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/irwfamend.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/irwfamend2.pdf
⁴² <https://www.dec.ny.gov/outdoor/24471.html#ump>
⁴³ <https://www.dec.ny.gov/lands/98307.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/jmwump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/jayumpamend.pdf
⁴⁴ <https://www.dec.ny.gov/lands/114618.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/jrwfinal.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/jrwfamend.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/jrwfamend2.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/spwumpamend.pdf
⁴⁵ <https://www.dec.ny.gov/lands/105779.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/lcimcump.pdf
⁴⁶ <https://www.dec.ny.gov/outdoor/24473.html#ump>
https://www.dec.ny.gov/docs/permits_ej_operations_pdf/lakedurantfinalump.pdf
⁴⁷ <https://www.dec.ny.gov/outdoor/24464.html#ump>
⁴⁸ <https://www.dec.ny.gov/outdoor/24469.html#ump>
⁴⁹ <https://www.dec.ny.gov/outdoor/24475.html#ump>
⁵⁰ <https://www.dec.ny.gov/outdoor/24476.html#ump>
https://www.dec.ny.gov/docs/permits_ej_operations_pdf/limekilnfinalump.pdf
⁵¹ <https://www.dec.ny.gov/outdoor/24477.html#ump>

⁵² https://www.dec.ny.gov/docs/permits_ej_operations_pdf/pisecofinalump2017.pdf
<https://www.dec.ny.gov/outdoor/24479.html#ump>

⁵³ <https://www.dec.ny.gov/outdoor/24482.html#ump>

⁵⁴ https://www.dec.ny.gov/docs/regions_pdf/mohawkvistafinal.pdf
Albert J Woodford Memorial State Forest <https://www.dec.ny.gov/lands/83241.html>
Steuben Hill State Forest <https://www.dec.ny.gov/lands/107919.html>
Mount Hunger State Forest <https://www.dec.ny.gov/lands/107942.html>
Ohissa State Forest <https://www.dec.ny.gov/lands/107938.html>
Otsquago State Forest <https://www.dec.ny.gov/lands/107934.html>
And 5 detached parcels of forest preserve

⁵⁵ <https://www.dec.ny.gov/outdoor/24483.html#ump>

⁵⁶ <https://www.dec.ny.gov/outdoor/24483.html#ump>
https://www.dec.ny.gov/docs/lands_forests_pdf/mrpwfump1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/mrpwfump2.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/mrpwfump4.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/mrpwfamend.pdf

⁵⁷ <https://www.dec.ny.gov/lands/107185.html>
https://www.dec.ny.gov/docs/lands_forests_pdf/mvhump1.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/mvhump2.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/mvh2018ump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/mvh1999ump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/mvh1999eis.pdf

⁵⁸ <https://www.dec.ny.gov/outdoor/24485.html#ump>

⁵⁹ <https://www.dec.ny.gov/outdoor/24486.html#ump>

⁶⁰ <https://www.dec.ny.gov/lands/83216.html>
Buck Hill, Canada Creek, Clark Hill, Jackson Hill, Penn Mountain, Point Rock, South Hill, Webster Hill, West Branch
https://www.dec.ny.gov/docs/regions_pdf/oneidahillsdrump.pdf

⁶¹ <https://www.dec.ny.gov/lands/28312.html>
https://www.dec.ny.gov/docs/regions_pdf/camumpone.pdf
https://www.dec.ny.gov/docs/regions_pdf/camumptwo.pdf

⁶² <https://www.dec.ny.gov/lands/80005.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/oswegatchiefinalrmp.pdf

⁶³ <https://www.dec.ny.gov/outdoor/24488.html#ump>

⁶⁴ <https://www.dec.ny.gov/lands/34719.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/pbwump.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/pepprbxamend.pdf

⁶⁵ <https://www.dec.ny.gov/lands/107648.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/plwump.pdf

⁶⁶ <https://www.dec.ny.gov/lands/102484.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/pigeonump.pdf

⁶⁷ <https://www.dec.ny.gov/outdoor/24489.html#ump>
<https://www.dec.ny.gov/outdoor/24491.html#ump>
https://www.dec.ny.gov/docs/permits_ej_operations_pdf/pisecofinalump2017.pdf

⁶⁸ <https://www.dec.ny.gov/outdoor/24492.html>

⁶⁹ <https://www.dec.ny.gov/lands/83175.html#Planning>
https://www.dec.ny.gov/docs/lands_forests_pdf/rbwfinal.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/whwfplanonly.pdf
<https://www.dec.ny.gov/lands/115357.html>
https://www.dec.ny.gov/docs/lands_forests_pdf/bigmooseirmp.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/fivemileirmp.pdf
https://www.dec.ny.gov/docs/lands_forests_pdf/seveysirmp.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/bigtupperirimp.pdf

Raquette Boreal Complex, including Raquette River Wild Forest, Raquette-Jordan Boreal Primitive Area, Dead Creek Primitive Area, White Hill Wild Forest and Five Mile, Kildare, Preston Lot, Goldmine, Hollywood Mountain, Hungry Bay, Peaked Hill, Dead Creek and Stark Conservation Easement Tracts

⁷⁰ <https://www.dec.ny.gov/lands/62816.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/remplacidump.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/rlptcamend2.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/rlptcamend3.pdf

⁷¹ <https://www.dec.ny.gov/outdoor/24494.html#ump>

⁷² <https://www.dec.ny.gov/lands/70572.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/srcafina1.pdf

⁷³ https://www.dec.ny.gov/docs/lands_forests_pdf/srmfthafina1.pdf

<https://www.dec.ny.gov/lands/70572.html#Planning>

⁷⁴ <https://www.dec.ny.gov/lands/22565.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/salmonrivertext.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/salmonriverappendicies.pdf

⁷⁵ <https://www.dec.ny.gov/outdoor/24496.html#ump>

⁷⁶ <https://www.dec.ny.gov/lands/114330.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/saranaclakesump.pdf

⁷⁷ <https://www.dec.ny.gov/lands/31376.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/scaroonump.pdf

⁷⁸ <https://www.dec.ny.gov/lands/82694.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/spblpfump.pdf

⁷⁹ <https://www.dec.ny.gov/lands/101901.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/sentinelump.pdf

⁸⁰ <https://www.dec.ny.gov/outdoor/24497.html#ump>

⁸¹ <https://www.dec.ny.gov/lands/53172.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/siameseump.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/spwumpamend.pdf

⁸² <https://www.dec.ny.gov/lands/100874.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/slwaump.pdf

⁸³ <https://www.dec.ny.gov/lands/50713.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/srwfinal.pdf

⁸⁴ <https://www.dec.ny.gov/lands/22578.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/stlflatump.pdf

Brasher State Forest, Buckton State Forest, Fort Jackson State Forest, Grantville State Forest, Knapp Station State Forest, Lost Nation State Forest, Raymondville State Forest, Sodom State Forest, Southville State Forest, Detached Forest Preserve parcels - 436 acres

⁸⁵ <https://www.dec.ny.gov/lands/22577.html>

[https://www.dec.ny.gov/docs/regions_pdf/stlawfhump\(1\).pdf](https://www.dec.ny.gov/docs/regions_pdf/stlawfhump(1).pdf)

Catherineville State Forest, Crary Mills State Forest, Degrasse State Forest, Downerville State Forest, Glenmeal State Forest, High Flats State Forest, Orebed Creek State Forest, Silver Hill State Forest, Snow Bowl State Forest, Taylor Creek State Forest, West Parishville State Forest, Whippoorwill Corners State Forest, Whiskey Flats State Forest

⁸⁶ <https://www.dec.ny.gov/lands/106186.html>

Beaver Creek State Forest, Bonner Lake State Forest, California Road State Forest, Cold Spring Brook State Forest - 1,068 acres, Fire-Fall State Forest, Greenwood Creek State Forest, Hickory Lake State Forest, Lonesome Bay State Forest - 1,122 acres, Pleasant Lake State Forest, South Hammond State Forest, Stammer Creek State Forest, Toothaker Creek State Forest, Trout Lake State Forest, Wolf Lake State Forest, Yellow Lake State Forest, Detached Forest Preserve parcels

⁸⁷ <https://www.dec.ny.gov/lands/106486.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/tpmcump.pdf

<https://www.dec.ny.gov/outdoor/24498.html#ump>

⁸⁸ <https://www.dec.ny.gov/outdoor/24499.html#ump>

⁸⁹ <https://www.dec.ny.gov/lands/74515.html>

Sears Pond State Forest, Grant Powell Memorial State Forest, Cobb Creek State Forest, Lookout State Forest, Granger State Forest, Pinckney State Forest, Tug Hill State Forest, Gould's Corners State Forest, Tug Hill Wildlife Management Area

⁹⁰ <https://www.dec.ny.gov/lands/115083.html>

Swancott Mill State Forest, Cottrell State Forest, East Branch Fish Creek State Forest, East Osceola State Forest, Lesser Wilderness State Forest, Line Brook State Forest, Mohawk Springs State Forest, Raywood Unique Area, Conservation Easement Lands within the Tug Hill East Unit: East Branch Fish Creek North, East Branch Fish Creek South

⁹¹ <https://www.dec.ny.gov/lands/97209.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/boathuntfishrmp.pdf

⁹² <https://www.dec.ny.gov/lands/92808.html>

https://www.dec.ny.gov/docs/regions_pdf/upsalump.pdf

Salmon River State Forest, O'Hara State Forest, Hall Island State Forest, Battle Hill State Forest, and West Osceola State Forest as well as Salmon River Open Space Conservation Easement lands on Huckleberry and Burdick Islands within the Salmon River Reservoir and the Jackson Road Boat Launch.

⁹³ <https://www.dec.ny.gov/lands/105777.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/vmwfplanonly.pdf

Hyslop CE https://www.dec.ny.gov/docs/lands_forests_pdf/hyslopdraftmp.pdf

Community Connector Trail https://www.dec.ny.gov/docs/lands_forests_pdf/cctp.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/vmwfamend3.pdf

Blue Ridge/ Upper Hudson Woodlands https://www.dec.ny.gov/docs/lands_forests_pdf/boathuntfishrmp.pdf

⁹⁴ <https://www.dec.ny.gov/lands/90760.html>

https://www.dec.ny.gov/docs/regions_pdf/viennadrump.pdf

Stone Barn State Forest, Fish Creek State Forest, Detached Forest Preserve

⁹⁵ <https://www.dec.ny.gov/lands/80005.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/watumpfinal.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/watonsamend.pdf

⁹⁶ <https://www.dec.ny.gov/lands/91857.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/westwardump.pdf

Balsam Creek State Forest, Beartown State Forest, Bonaparte's Cave State Forest, Frank E. Jadwin Memorial State Forest, High Towers State Forest, Hogsback State Forest, Independence River State Forest, Indian Pipe State Forest, Lowville Demonstration Area, Onjebonge State Forest, Otter Creek State Forest, Sand Bay State Forest, Sand Flats State Forest, Forest Preserve Detached Lots, Fishing Access Sites - Crystal Creek, Castorland, Burdick's Crossing, Beeches Bridge east and west, Lowville, Glenfield, Denley Dam, and Deer River, Fisherman's Parking Area - McConnell Road and Blue Street

⁹⁷ <https://www.dec.ny.gov/lands/90459.html>

https://www.dec.ny.gov/docs/lands_forests_pdf/wfvol1ump.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/wfvol2ump.pdf

⁹⁸ <https://www.dec.ny.gov/lands/114951.html#Planning>

⁹⁹ <https://www.dec.ny.gov/lands/9165.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/whitney.pdf

¹⁰⁰ <https://www.dec.ny.gov/outdoor/24500.html#ump>

¹⁰¹ <https://www.dec.ny.gov/lands/88875.html#Planning>

https://www.dec.ny.gov/docs/lands_forests_pdf/wwfwholeplan.pdf

https://www.dec.ny.gov/docs/lands_forests_pdf/wwfdraftamend.pdf

¹⁰² Alternative #1 is 6 events per year

¹⁰³ <https://www.ecfr.gov/cgi-bin/text->

[idx?SID=6b8e629cbac80e3d59550a7e90b32058&mc=true&node=pt40.37.1508&rgn=div5#se40.37.1508_118](https://www.ecfr.gov/cgi-bin/text-idx?SID=6b8e629cbac80e3d59550a7e90b32058&mc=true&node=pt40.37.1508&rgn=div5#se40.37.1508_118)

¹⁰⁴ <https://www.ecfr.gov/cgi->

[bin/retrieveECFR?gp=&SID=e878e6e44364af2003ddaf3782a1fb17&mc=true&r=PART&n=pt40.37.1502#se40.37.1502_12](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e878e6e44364af2003ddaf3782a1fb17&mc=true&r=PART&n=pt40.37.1502#se40.37.1502_12)

[0](#)

¹⁰⁵ <https://catalog.archives.gov/id/75315750>

¹⁰⁶ <https://catalog.archives.gov/id/75315750>

¹⁰⁷ 40 CFR §1508.14 Human environment. Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment. (See the definition of “effects” (§1508.8).) This means that economic or social effects are not intended by themselves to require preparation of an environmental impact statement. When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment. https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e878e6e44364af2003ddaf3782a1fb17&mc=true&r=PART&n=pt40.37.1508#se40.37.1508_113

¹⁰⁸

<https://www.law.cornell.edu/cfr/text/40/1508.27#:~:text=%C2%A7%201508.27%20Significantly%20affected%20interests%20and%20the%20locality.>

¹⁰⁹ (40 CFR § 1508.27 (a))

¹¹⁰ 40 CFR § 1508.27 (a)

¹¹¹ 40 CFR § 1508.27 (b)