



August 5, 2020

Ms. Cait Schadock
National Environmental Policy Act Coordinator
Directorate of Public Works
4896 Jones Street
Ft. Drum, NY 13602

Re. Programmatic Environmental Assessment/ Combat Aviation Brigade Mission and Training

Dear Ms. Schadock,

Adirondack Wild: Friends of the Forest Preserve is a not-for-profit advocate and educator about the wilderness and wild lands of the Adirondack Park, including the Park's constitutionally protected public lands known as the Adirondack Forest Preserve. We act and speak for our 950 members and their families who live in, visit, and appreciate parts of the nine-county region affected by the proposed mission and training activities out of Ft. Drum. We appreciate the opportunity to comment about the activities proposed in the Programmatic Environmental Assessment (PEA), their attributes, considerations, and impacts.

The Adirondack Park: At the outset, we note that the proposed increase in intensive air and land-based training within the nine counties and within the desired 60-75 flight miles from Ft. Drum includes large swaths of the six-million acre Adirondack Park, created by the State Legislature in 1892. The presence of the Adirondack Park should be significantly noted within the PEA. The Park is afforded multi-layered protection under the "forever wild" provision of the New York State Constitution (Article 14), and under the state's Environmental Conservation Law, the state's Adirondack Park Agency Act, the Adirondack Park State Land Master Plan, the Wild, Scenic and Recreational Rivers Act and Freshwater Wetlands Act. All the public lands within the Park known as the Forest Preserve have received National Landmark status from the National Park Service. The entire Adirondack Park is a designated International Biosphere Reserve under the Man and Biosphere Program in cooperation with an arm of the United Nations, UNESCO. We mention these provisions of law and designations because underlying them are nearly 150 years of demonstrated and sustained, statewide support and concern for the conservation of the Adirondack Park region.

Need for a Two-Step Process: Among the PEA stated goals are the objectives to avoid or minimize impacts to protected lands, to avoid steep slopes, wetlands, wetland soils, riparian environments, and habitats of rare, threatened or endangered species of birds and animals. These features and resources are widespread and replete throughout the highly sensitive Adirondack Park, making the job of identifying and then quickly evaluating locations suitable for the described intensive air and land training activities out of Ft. Drum extremely challenging.

Therefore, we encourage the Army to follow a two-step environmental impact and screening process, whereby this PEA is initially focused on narrowing the site selection process through a screen that identifies specific locations and alternative locations meeting PEA criteria outside of the protected Adirondack Park. If after your evaluation of public comments, coordination with other agencies and internal review of your air and land training requirements there are necessary reasons to evaluate sites within the protected Adirondack Park, we recommend that a narrowly focused Environmental Impact Statement (EIS) be conducted to describe, evaluate and mitigate impacts to sites in the Adirondack Park that meet the Army's criteria, but which are also outside the boundaries of the public lands known as the Forest Preserve.

Criteria: We also ask that the PEA **Criteria for Selecting Possible Exercise Locations** include *Rural Areas Outside the Boundaries of the Adirondack Park and Rural Areas Outside the boundaries of the Adirondack Forest Preserve*. Under attributes, the Forest Preserve should be completely avoided. The rationale is embedded within Ft. Drum's PEA itself. The Forest Preserve must not only be "forever kept" and protected as wild forest lands under Article 14 of the NYS Constitution and related statutes, it appears not to meet the PEA criteria, it being rugged, hilly, even mountainous, heavily forested, with very little grassland, containing a great deal of wet, organic, poorly drained soils, and dotted with wetlands, stream corridors, significantly sized lakes and many smaller ponds. Furthermore, the great majority of Forest Preserve exists many miles from existing road access. In all, the very nature, terrain, and conditions within the Forest Preserve poorly meet the criteria listed under possible exercise locations, and thus should be avoided.

There are many alternative potential locations for the proposed training within the 9-county area including State Reforestation areas, State Forests, and lands under Conservation Easement, to name just some possible categories. These and other categories of lands outside of the Adirondack Park (and, only if judged necessary, inside Park boundaries under an EIS) are less rugged and less remote and meet the PEA's stated criteria better than the "forever wild" Forest Preserve.

Alternatives: We ask that the Army select Alternative 2 for a region as sensitive and as heavily visited as the 9-county region, some of which exists within the boundaries of the protected Adirondack Park. Up to six high intensity, 14-day missions has the potential to severely impact many places, people, domestic animals, and sensitive wildlife habitats within the North Country in every season of the year. Alternative 2 limiting training exercises to up to two high intensity, 14-day missions and excluding live fire, explosions and unmanned flights is better suited to the North Country and is more readily adaptive to off-peak seasons of the year, so we urge the Army to adopt this alternative.

Discussion of Environmental Impacts: The scope of environmental impacts, while appropriately broad, still excludes some key resources found within the 9-county area which must be evaluated. These additional resources can be grouped under *Wilderness and Wildland Resources*. Among these are attributes of *Naturalness and Wilderness solitude*, including opportunities and freedom to experience a primitive or unconfined recreational experience in wilderness environments free from sight and sound of mechanized uses and other direct and indirect impacts of military training exercises.

With up to eleven units of Adirondack Forest Preserve, including public lands classified as Wilderness, Primitive or Wild Forest near or within the perimeter of the planned training exercises, there is great potential to compromise and disrupt these wilderness resources attributes and opportunities defined in the NYS Constitution, Environmental Conservation Law and the Adirondack Park State Land Master Plan. Therefore, we ask that *Wilderness and Wildland Resources* be listed and described within the

scope of actual and potential environmental impacts. We reiterate our recommendation that the training exercises be completely excluded from the boundaries of the Forest Preserve, for the reasons stated.

Conclusion: We again recommend a two-step process. Once public and agency comments are fully considered, and only if locations inside the Adirondack Park are shown necessary through the PEA process, that Ft. Drum meet with, consult with and coordinate with agencies most familiar with the Adirondack Park, namely the NYS Department of Environmental Conservation and the NYS Adirondack Park Agency. Both agencies can help the Army to significantly narrow the range of possible military exercise locations outside of the boundaries of the Forest Preserve. Given close coordination with these other agencies, if the list of sites includes some within the Park an EIS process can then efficiently be conducted to narrowly identify, evaluate, and mitigate actual and potential environmental impacts upon the least sensitive locations.

Thank you for considering our comments and recommendations.

Very sincerely,

A handwritten signature in black ink, appearing to read "David Gibson". The signature is fluid and cursive, with a long horizontal stroke at the beginning.

David H. Gibson, Managing Partner
Adirondack Wild: Friends of the Forest Preserve

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cc: Richard Weber, NYS Adirondack Park Agency
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