

**Appendix A**  
**Agency Coordination and Public Involvement**

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**PEA Public Review Comment Response Matrix**

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Fort Drum PEA Public Review COMMENT/RESPONSE - Agency Comments

Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
1	1	New York State Historic Preservation Office, Division for Historic Preservation (SHPO)	Nancy	Herter	Archaeology Unit Program Coordinator	Based upon this review it is the opinion of the SHPO that no historic properties, including archaeological and/or historic resources, will be significantly impacted by this undertaking with the implementation of the Best Management Practices and Compliance Measures for Alternatives 1 and 2, noted on pages 64-65.	Thank you for your comment. SHPO's Opinion has been added to the Cultural Resources Section. Additionally, the following was added to the PEA: "Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize cultural resource impacts based on consultation or coordination with the appropriate regulatory agencies, including the NYSHPO and APA. Review of training locations by Fort Drum Cultural Resources as part of the environmental review and consultation with SHPO will ensure protection of known and potential cultural resources.
2	1	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The APA recognizes and supports the U.S. Army's critical mission to provide effective training. Staff appreciates that the Army has taken the necessary first steps in evaluating the potential impacts associated with the proposed training activities.	Thank you, Fort Drum acknowledges and appreciates the APA comment. Evaluating environmental and human impacts of our training activities is extremely important to Fort Drum and was the driving force for establishing an Ad Hoc Committee formed to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
2	2	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The scope and detail of the analysis at the programmatic level however does not appear to be sufficient to support a finding of no significant impact given the complexity and sensitivity of the Action Area and the Adirondack Park in particular. The proposed tiered assessment process appears to segment decision making inappropriately and Agency staff urges the Army to prepare an Environmental Impact Statement (EIS).	<p>Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require an EIS. As we work through the process we will continue to plan for measures that will avoid and or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. Specific site selection will follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions.</p> <p>The consultation and coordination process used to select future sites will ensure that any training proposals that have significant impacts are screened out from consideration and will not be selected. It is acknowledged and agreed that in the unlikely event any future proposed action with significant impacts is identified, an EIS will be developed prior to conducting the training. However, Fort Drum has no intention of conducting any training with impacts that rise to the level of being significant thus necessitating an EIS. The PEA has been revised to state that the appropriate level of environmental documentation for the site specific action will be prepared by Fort Drum.</p>

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2	3	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Agency staff has a long history of working effectively with the NYANG in the process of modifying the MTRs and MOAs in the Adirondack Airspace and we recommend that a similar stakeholder process be employed here given the significance of the proposed action.	Agreed, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review and agency coordination is conducted when those sites are proposed for training events.
2	4	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The Agency may have jurisdiction over some of the activity identified in the PEA and should therefore be consulted in the environmental review process. Similar to the other State agencies and municipalities listed in Appendix A-1 outlining the Fort Drum PEA Coordination and Consultation Mailing, the APA should be cited and consulted during the course of your planning and environmental review process. The Agency administers the State Wetland Act within the Park and should be consulted regarding any activity that may involve regulated wetlands. The APA is also responsible to review jurisdictional new land use and development on both public and private lands within the Park.	Acknowledged and agreed. Fort Drum formed an Ad Hoc Committee, that included the Adirondack Park Agency as part of that committee. The appropriate level of environmental documentation for the site specific action would be prepared by Fort Drum and the APA consulted during that environmental review process to provide input; as well as review land use and development on public and private lands in the Park. Fort Drum is committed to avoid/minimize training that would adversely impact aquatic resources.
2	5	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Agency staff believes that the information provided in the PEA is insufficient and that greater detail is required to understand the proposal and to accurately evaluate the potential resource impacts associated with it. The proposal poses a greater significance of environmental impact then identified and a FONSI does not appear appropriate at this time. Agency staff believes that a full EIS is warranted and that greater opportunity for public review should be provided. Given that the use of public lands has been identified as a priority and that there is a strong public interest in the management of State lands in the Park, broader stakeholder involvement is considered appropriate. Scoping and a more detailed description of the proposed action as park of a full EIS will also help to support the necessary findings to be made for an eventual training program.	<p>Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require an EIS. As we work through the process we will continue to plan for measures that will avoid and or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions.</p> <p>The consultation and coordination process used to select future sites will ensure that any training proposals that have significant impacts are screened out from consideration and will not be selected. It is acknowledged and agreed that in the unlikely event any future proposed action with significant impacts is identified, an EIS will be developed prior to conducting the training. However, Fort Drum has no intention of conducting any training with impacts that rise to the level of being significant thus necessitating an EIS. The PEA has been revised to state that the appropriate level of environmental documentation for the site specific action will be prepared by Fort Drum.</p>
2	6	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The use of a tiered analysis as part of an initial environmental assessment appears to segment the decision making inappropriately and staff do not believe it should be employed here.	The EA has been revised to state that the appropriate level of environmental documentation for the site specific action will be prepared by Fort Drum. This PEA is about process and procedure and should be applied to land use so that any future activity would not require further analysis. Finalized screening criteria through the Ad Hoc Committee collaboration would document site status and use requirements.

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2	7	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Timing and Duration of Training Activity - Agency staff believe more detail is needed to support the determination that potential duration of training activity on public land can be considered minor and short term. The PEA identifies in Alterative 1 up to 6 events per year lasting a total of 21 days each and totaling potentially 126 days per year. The PEA also indicates that it intends to prioritize the use of public lands and to avoid impacts to wildlife and recreational uses by avoiding key sensitive wildlife periods like migration and nesting and peak recreational periods such as fishing, hunting, and boating. A program of repeated training of this nature, year after year with coordinated air and motor vehicle support and with the temporary development of encampments ranging in size between 5 and 10 acres has the potential to create longer term impacts to overall management of State lands in the Park.	Acknowledged and agreed. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts. Monitoring of sites by Fort Drum environmental staff will occur to ensure cumulative impacts do not happen. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum's decision to avoid selection of any sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
2	8	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Agency staff believe more detail is required in assessing the cumulative impact of the training program of this type over a longer time period than a year.	The PEA describes the application of criteria Fort Drum utilized to identify potential areas for the proposed training events. Fort Drum’s intention is to prepare the documentation of the Proposed Action at a programmatic level to provide a framework and criteria to assess the impacts on specific sites once those are selected. Therefore, due to the programmatic nature, cumulative impacts analysis in this PEA considers the two training exercises that occur within the proposed action area. For the identification of specific sites, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts.
2	9	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Staff also believes that the potential increases in levels of aircraft activity associated with this new proposal in the UFA, MOAs and MTRs should be more clearly described and assessed.	There is no overall increase of helicopter aircraft. Helicopters routinely fly in the LFA and MOAs. The number of aircraft landing would depend on the mission and the size of the site. In some scenarios there would be no aircraft. Specific aircraft activity will be called out by mission. Since all training scenarios and missions are variable, a threshold, per site, would be determined to ensure impacts would not occur.
2	10	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Finally, the environmental analysis should describe in greater detail how the mitigation strategy of avoiding impacts to wildlife and various recreational uses, including wintertime uses, will fit with a schedule of potentially 126 days in a given year.	Aknowledged and Agreed. Site specific conservation measures to avoid impacts to wildlife, including threatened and endangered species, would be developed in consultation with USFWS and NYSDEC at the time of site selection. Conservation measures may include seasonal restrictions at specific sites to avoid impacts to species such as migratory birds and bats. Similarly, measures to avoid or minimize impacts on recreation would be based on consultation or coordination with the appropriate regulatory agencies, including the APA. Fort Drum would seek to develop these measures in manner that would avoid or minimize impacts on resources while fulfilling the purpose and need for the proposed action. To avoid impacts to wildlife and recreation not all sites will have the same number of training days. Site use thresholds will be established when identified with the appropriate regulatory and agency coordination.

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2	11	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The programmatic assessment does not identify the two-tiered structure established by the legislature for the management of State lands in the Adirondack Park or for the APA's responsibility for the long-term planning and policy for the State lands, in consultation with the DEC. The Adirondack Park State Land Master Plan (APSLMP) administered by the Agency establishes the classification of the State lands and provides guidelines and criteria. for their management.	Acknowledged. Details about the two-tiered management approach of the Adirondack Park by the APA and NYSDEC has been included in the PEA. Information from the Adirondack Park State Land Master Plan including Park Land classifications and management were added to the PEA. Fort Drum formed an Ad Hoc Committee that included the Adirondack Park Agency and NYSDEC as part of that committee. Site selection will follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
2	12	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	All State lands in the Park are protected and managed for the sensitive biological and ecological resources they contain. As a general principle of the APSLMP, the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded. This principle is a very high standard and should be considered when evaluating alternatives across the entire Action Area, when considering mitigation strategies and when making determinations of significance of an impact.	The selection of the sites would be based on consultation or coordination with the appropriate regulatory agencies (including the APA) and the AdHoc committee, and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans.Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
2	13	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Agency staff recommend that the PEA be more specific about the various designations of Stale lands in the Park and clearly identify the sensitive resources and uses that should be avoided within these areas, in consultation with both the DEC and APA. This can serve as a first step in evaluating whether the use of these areas is appropriate when weighed against the alternatives across the entire proposed Action Area. Without greater detail at the programmatic assessment level, it is difficult to evaluate how the Forest Preserve lands inside the Blueline are to both be prioritized for use and avoided, and to determine by what criteria the use, if any, of public lands is to be undertaken. Reviewing this as part of a more detailed EIS is recommended due to the complexity of the resource protection concerns and the strong public interest in the management of State lands.	The PEA has been revised to include land designations/land use of Public and Privately owned land in the Park. For specific site selection, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, including the APA and DEC. Fort Drum will coordinate land use with appropriate agencies for lands inside the Adirondack Park boundary and ensure impacts to sensitive resources are avoided. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
2	14	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The PEA states that "'most of the registered historic places are located in cities and villages..." The programmatic assessment does not mention or consider the nearly 2.6 million acres of designated Forest Preserve listed on the National Register of Historic Places as the Adirondack Forest Preserve National Historic Landmark, listed on October 15, 1966, Reference No .. 6600891. The Cultural Resource section of the PEA states that historic resources will be avoided. Without greater detail at the programmatic assessment level, it is difficult to evaluate how the Forest Preserve lands inside the Park are to both be prioritized for use and avoided and, to determine by what criteria the use, if any, of public lands is to be undertaken.	The PEA has been revised to add that the Adirondack Forest Preserve is on the NRHP as a National Historic Landmark. It will also be added that during consultation, the SHPO stated that no historic properties, including archaeological and/or historic resources, will be significantly impacted by this undertaking with the implementation of the Best Management Practices and Compliance Measures for Alternatives 1 and 2. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize cultural resource impacts based on consultation or coordination with the appropriate regulatory agencies, including the NYSHPO and APA. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).

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2	15	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The proposed ground training activities with coordinated air support is a distinctly different type of impact that will be added to the existing impacts related to the F-16 and F-35 training in the established MTRs and MOAs. The fixed-wing training that has occurred in the established MTRs and MOAs this year have resulted in a number of camp owners, environmental advocacy groups, recreationists and residents calling the Agency expressing concerns about the perceived increase in training activity. Agency staff directed the callers to contact the NYANG's 800 phone number to ask questions or to lodge a complaint if they desired. Though anecdotal, Agency staff have not received this number of inquiries in recent memory. This is mentioned to recognize that there may already exist a significant level of concern with the existing noise associated with the established Airspace usage over the Park. Adding additional activity may result in the cumulative impact of the Fixed wing and the activities associated with the new proposal reaching a level of annoyance.	<p>Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. There is no overall increase of helicopter aircraft. Helicopters routinely fly in the LFA and MOAs. The number of aircraft landing would depend on the mission and the size of the site. In some scenarios there would be no aircraft. Specific aircraft activity will be called out by mission. Since all training scenarios and missions are variable, a threshold, per site, would be determined to ensure significant impacts would not occur.</p> <p>Once the specific site has been selected following the procedures developed by the Ad Hoc Committee, other military noise sources will be considered when assessing cumulative impacts in addition to the impacts from the Proposed Action.</p>
2	16	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	Agency staff believe the addition of new noise sources for the duration of the coordinated exercises as described in the PEA may cause more sustained and greater noise impacts beyond the startle effects, temporary displacement and habituation as identified in the draft PEA. Staff note that the assessment methodology employed is dated 1974 and the literature citations used for supporting the conclusions made about potential wildlife impacts are greater than 20 years old. In particular, the noise analysis appears to use an established background, ambient noise level of approximately 60 dBA which may be appropriate for a suburban setting. When considering potential impacts to wildland settings it appears it is more relevant to consider a lower ambient level between 20 dBA to 30 dBA. Extensive and more recent research is now available and methods of analysis as employed by the National Park Services Soundscape Programs are examples of the level of detail that should be used in assessing the potential impacts of noise to wildlife and recreationists seeking an opportunity for solitude in the Wilderness and Wild Forest areas of the Adirondacks.	The proposed aircraft are the same aircraft that Fort Drum uses now. No new sources of noise are proposed. Aircraft and helicopter noise effects on wildlife studies were primarily performed more than 20 years ago as stated. References are from a variety of sources including USAF, CERL (USACE), and USFWS. No Adirondack-specific information is known. The NPS has not performed noise effects studies on wildlife. However, soundscape studies sponsored by NPS can be incorporated into environmental documentation when specific operations are known.
2	17	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The environmental impact analysis should be more specific when identifying sensitive resources, evaluating alternatives and when discussing mitigation strategies such as temporal avoidance and physical buffering. This analysis should be focused on both an ecological and human experience perspective, particularly in relation to the designated Wilderness and Wild Forest areas.	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.

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2	18	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The PEA considers the two training exercises that occur within the proposed Action Area including (1) Jaded Thunder- Per Fort Drum Special Operations exercise that only occurs when the CBA is deployed and includes fixed wing aircraft, and (2) National Guard Bureau - Camp Ethan Allen Exercise. Agency staff believes cumulative impacts should not be reviewed within the context of only the two exercises discussed in the PEA. The Army should also consider the current training proposal as additional impacts to the already established impacts associated with the training exercises occurring in the MTRs, MOAs and LFAs over the Park today.	The PEA describes the application of criteria Fort Drum utilized to identify potential areas for the proposed training events. Fort Drum’s intention is to prepare the documentation of the Proposed Action at a programmatic level to provide a framework and criteria to assess the impacts on specific sites once those are selected. Therefore, due to the programmatic nature, cumulative impacts analysis in this PEA considers the two training exercises that occur within the proposed action area. For the identification of specific sites, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts.
2	19	Adirondack Park Agency	Richard	Weber	Deputy Director - Planning	The Agency has in the past worked closely with the NYANG in the planning and environmental review of changes to the Adirondack Airspace for training purposes. Staff believes the model employed for that work should be undertaken here for this important training program.	Agreed, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is
3	1	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The DEC appreciates the opportunity to comment and strongly supports the need to provide the best training opportunities possible for our soldiers stationed at Fort Drum.	Fort Drum appreciates NYSDEC comments on the PEA and support for training opportunities for the Soldiers stationed at Fort Drum.
3	2	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	While we appreciate the current process for completion of environmental review, we encourage a renewal of the history of direct discussion and engagement. Discussing the needs of the Army and how they apply to the characteristics, legal protections, and public concern for lands under DEC jurisdiction with both DEC and members of the public will increase the likelihood of quickly identifying appropriate and broadly supported sites.	Agreed, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.

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3	3	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The document should reference specifically stated definitions for the categories of public lands mentioned -- such as Wildlife Management Areas, State owned Forest Preserve (classified as Wild Forest, Wilderness, etc.) and State Forests --rather than reference them as "protected lands, parks and recreation areas." The terms for different categories of lands should be used consistently throughout the document.	The PEA has been updated to include the definitions for public and private lands in the Adirondack Park. "Protected lands" was removed from the PEA.
3	4	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The PEA references Forest Preserve in descriptions of lands use types but makes no reference to unique characteristics or legal protections given Forest Preserve Lands under state law. No avoidance or mitigation measures for potential adverse effects to Forest Preserve are discussed.	The PEA has been updated to include the definitions for public and private lands in the Adirondack Park. Fort Drum formed an Ad Hoc Committee that included the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	5	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The discussion of noise impacts in §3.2.1 states that people's level of irritation due to noise depends upon the setting and their expectations. Wilderness Areas are designated in part for their remote nature and absence of the intrusion of man. With strict exceptions, motorized equipment and vehicles are excluded from Wilderness to preserve the wilderness experience. Therefore, the use of the day-night weighted average to gauge level of intrusiveness is not valid for these areas. People enter Wilderness with an expectation, and often, the purpose of avoiding exposure to noise from mechanized sources. See Minnesota v. Black, 660 F. 2d 17 40 (8th Cir 1981) cert denied.	Agreed, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
3	6	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The "Avoidance Areas" map does not depict the areas from prior Environment reviews for use of air space over the region designating areas to avoid, particularly for low-level flights over Forest Preserve. These were previously agreed upon between the United States, New York State, and other stakeholders and incorporated into environmental reviews for military flights. See, for example, Final Environmental Assessment for Proposed to the New York National Guard Adirondack Range Air Space Modifications, section 3.5.1 and Figures 3.5-1a through 3.5-2e.	The PEA addresses the "Avoidance Areas" as listed in the New York National Guard Adirondack Range Air Space Modifications Environmental Assessment (2004). The PEA strives to avoid sensitive areas like Bald Eagle nest sites by 1500 ft AGL, and avoid persons and structures by 500 ft. AGL when possible, maintain higher altitudes when flying over populated areas, and avoid wilderness areas and scenic waterways.

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3	7	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	If low-level flights are expected to take place at elevations and in locations that vary from previously assessed activities, an Environmental Impact Statement should be prepared to assess the potential for significant environmental effects of this proposal.	<p>Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require EIS. As we work through the process we will continue to plan for measures that will avoid and or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions.</p> <p>The PEA has been revised to state that the appropriate level of environmental documentation for the site specific action will be prepared by Fort Drum.</p>
3	8	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	With respect to the Military Training Routes (MTR) flight paths, they are not imposed upon a map layer that depicts public lands, including the land areas we previously identified as noted above.	Please refer to figure 1-4.
3	9	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The PEA states that use of public lands will be preferable (versus private) while at the same time they state they will "avoid protected lands, parks and recreation areas, if possible." The PEA does not define the terms "protected lands, parks, and recreation areas." Forest Preserve, Wildlife Management Areas, and Reforestation Areas are "protected lands" and "recreation areas," and comprise the majority of public land within the affected area.	Protected lands was removed from the PEA. The PEA has been revised to include different public and private land designations in the Park and will be revised to better define land use categories. Additionally, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, establishing, using and restoring potential training locations (when needed), and determining types of land use agreements appropriate for future off-post training missions. Together with the Ad Hoc Committee, Fort Drum will select specific sites that would minimize impacts to land use and land within the Adirondack Park. When sites are selected, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, including the APA and DEC. Sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	10	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The PEA does not state criteria for determining whether avoidance of protected lands, parks, and recreation areas will be "possible."	Protected lands was removed from the PEA. When sites are chosen, Fort Drum will prepare an appropriate level of environmental documentation. Sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	11	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The PEA should address measures to be taken to avoid or mitigate impacts to Wild, Scenic and Recreational Rivers as defined by Article 15 title 27 of the New York state Environmental Conservation Law.	Acknowledged. Information about State Wild, Scenic, and Recreational rivers has been added to the PEA, along with measures to avoid/mitigate impacts to Wild, Scenic and Recreational Rivers.



**Fort Drum PEA Public Review COMMENT/RESPONSE - Agency Comments**

Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
3	12	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The PEA does not address the potential for impacts to air quality that could result from operations of vehicles and other mechanized equipment in the areas where operations will occur.	Air quality impacts were not a VEC analyzed in detail in the PEA because emission sources during a training support action are mobile and will vary based on mission. Fort Drum has a responsibility to ensure the proposed action conforms to the State Implementation Plan (SIP) before the action is taken. Once a site has been selected and more details are know regarding the specific training action, such as the size and type of equipment to be used, duration of equipment use, and the attainment status of the selected training area, the Fort Drum Air Quality will review the project to ensure conformity with the SIP. This review will ensure criteria pollutant emissions will not exceed di minimis levels for training activities not categorically excluded from the requirement to perform conformity analysis.
3	13	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Mitigation of previous proposals for military flights in the area in question included prior notice to the public along flight routes and a telephone number the public could call to provide comments or complaints. These should be considered for both the land and air portion of these exercises.	Acknowledged. There will be a public announcement and contact made available prior to large off-post training missions. To report low-flying helicopters, artillery noise, vehicle activity or any other disturbance, contact the Fort Drum Public Affairs Office at (315) 772-5461.
3	14	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	It would be best if the PEA could recognize that the large protected areas implicated by the alternatives will have an impact on eventual training operations.	Acknowledged. When training sites are chosen, Fort Drum will prepare an appropriate level of environmental documentation.
3	15	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Prior reviews of low-level military flights developed significant public interest, resulting in the establishment of a working group to provide information to the public and address public concerns. Non-governmental stakeholders from that working group should be provided notice of the proposal with a copy of the PEA and additional time to comment. A previous proposal for use of a state reforestation area for military exercises similarly generated significant public interest. Inclusion of a public participation process to provide information to the public and receive public comments regarding use of public lands is strongly recommended. DEC can provide assistance with public participation regarding use of state lands under DEC jurisdiction.	Agreed, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. Protected lands was removed from the PEA. When sites are chosen, Fort Drum will prepare an appropriate level of environmental documentation. Sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	16	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The PEA mentions state forests and conservation easements as possible locations for encampments. The PEA provides an excellent explanation of the criteria needed for potential training areas. We recognize that identifying specific sites will be part of a future process and will cooperate as needed in that process.	Thank you for your comment. For specific site selection, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize such impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions.
3	17	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	A previous proposal for large-scale military use of state lands generated significant public interest and concerns. DEC suggests inclusion of a process for public engagement to provide information regarding exercises and solicit comments.	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).

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Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
3	18	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Please be aware that lands under DEC jurisdiction will have few areas that meet the criteria identified. Section 3.1.1.2 "Land Use in the Nine-County Area" describes the land use in each of the counties. The last paragraph of this section titled, "Regional Land Use Summary" states: "Adirondack Park located approximately five miles east of the Fort Drum boundary contains six million acres of federally protected forests on public and private lands." Though it is possible that statement relates to the National Historic Register designation of the Adirondack Forest Preserve, that does not include the private land within the Park.	Thank you for your comment. This paragraph has been revised.
3	19	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page FNSI-iii - In Table FNSI-1, under Land Ownership, it should reference Temporary Revocable Permits (TRPs) for state lands.	Table FNSI-1 was revised to include TRPs for State Lands.
3	20	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page ES-iv - In the first paragraph on this page it says, "Fort Drum's intent is to prioritize use of public lands." Most of our state forest, conservation easement, forest preserve, and wildlife management areas would not have the 5 to 10 acres or more of open fields that the PEA states are needed for the encampments that are part of the exercises proposed.	Fort Drum formed an Ad Hoc Committee, that included the Adirondack Park Agency as part of that committee. The appropriate level of environmental documentation for the site specific action will be prepared by Fort Drum and the APA will be consulted during that environmental review process to provide input; as well as review land use and development on public and private lands in the Park.
3	21	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 13 - The last paragraph on this page has the same statement as Page ES-iv above about prioritizing public lands.	Acknowledge and agreed. Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
3	22	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 14 - Table 2-1 is the same table as Table FNSI-1, so it should also mention TRPs.	Table 2-1 has been revised to include TRPs for State Lands.
3	23	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 24 - Jefferson County paragraph - The third sentence says, "Jefferson County contains acres of state and county forests and wildlife management areas and parks." There are thousands of acres of state forest, wildlife management areas, and state parks, and county forest and local parks.	The PEA has been revised to reflect comment.

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Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
3	24	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 25 - Herkimer County paragraph - The upper part of Herkimer County is within the Adirondack Park. Much of the land in this part of the county is Forest Preserve lands including campgrounds and wilderness areas. Outside the portion within the Adirondack Park there are state forests north and south of the Mohawk River and a significant amount of agricultural lands.	The PEA has been revised to reflect comment.
3	25	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 25 - St. Lawrence County paragraph - The first paragraph references the southeastern third of St. Lawrence County as having paper and wood product industries. There are a limited number of papermills and sawmills and other wood product producers in this area, other than landowners that manage their lands for timber production. Most of them are smaller private landowners while the larger ones are commercial timber investment entities, rather than industry wood product companies. Easement lands referenced within the Adirondack Park are privately owned land that NYS has acquired a conservation easement on. These easements usually include some public recreation rights though not on all easements. The state also acquires most of the development rights as part of the Conservation Easement to limit the amount of development that can occur on the ownership.	The PEA has been revised to reflect comment.
3	26	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 25 - Hamilton County paragraph - Unlike the preceding paragraphs for Herkimer and St. Lawrence County, this paragraph fails to state the existence of Forest Preserve within the county. The second sentence states: "Because Hamilton County is located in the Adirondack Park, any development in the county is limited by the NYS Constitution, which protects the park land." This is not entirely accurate. The Forest Preserve land owned by the state within the Adirondack Park is protected from development by the NYS Constitution. Forest Preserve is a significant component of the land within the county, but private land development activities are regulated pursuant to the NYS Executive Law as well as local land use laws.	The PEA has been revised to reflect comment.
3	27	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 25 - The paragraphs pertaining to Essex, Lewis, and Oneida counties fail to note the presence of Forest Preserve within those counties.	The PEA has been revised to reflect comment.
3	28	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 25 - The paragraph regarding Lewis County states: "Over 50 percent of the land in Lewis County is designated as Wild/Forest..." Is this a description of cover-type, or official classifications of publicly owned land by the governmental entity with jurisdiction over the lands in question?	The paragraph was revised to state" Over 50 percent of the land in Lewis County is designated as Conservation/Park". This was taken from the most recent land use map.
3	29	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 25-6 - Regional Land Use Summary - One sentence says, "Adirondack Park located approximately five miles east of the Fort Drum boundary contains six million acres of federally protected forests on public and private lands." There is no federal protection of lands within the Adirondack Park. The Forest Preserve (the State-owned) portion of the Park is listed in the National Register of Historic Preservation. The final sentence of this paragraph says, "Land use policies in the surrounding counties are under the jurisdiction of those counties and dictate how land would be used in the counties." While that may be accurate for private lands (though I believe municipalities and towns have more direct control than counties), it is not accurate for State lands within these counties.	The PEA has been revised to reflect comment.

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Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
3	30	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Page 34-35 - 3.2.2.3 Alternative 1 - This section assesses the effect of noise on humans, wildlife, and domestic animals as a result of the proposed exercises. Regarding off-base flights, no routes for helicopter flights are identified. The potential for adverse noise impacts to Forest Preserve and Wilderness areas as defined in the Adirondack Park State Land Master Plan are not addressed.	Fort Drum’s intention is to prepare the documentation of the Proposed Action at a programmatic level to provide a framework and criteria to assess the impacts on specific sites once those are selected. Once the specific site has been selected, following the procedures developed by the Ad Hoc Committee, additional flight information will be provided in the appropriate level of environmental document.
3	31	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Figures 3-5 and 3-6 do not exclude the possibility of repeated low-level flights over Forest Preserve generally or Wilderness areas specifically.	Acknowledged. The topic of flight training requirements and flight restrictions for the Adirondack Park will be a topic discussed in the Ad Hoc Committee.
3	32	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Significant areas of Forest Preserve, including Wilderness Areas, are affected by noise from military training flights that were subject to previous reviews that included extensive consultation with the United States, New York State, and other stakeholders to address stakeholder concerns. These included mitigation measures, including maintaining flights at specific elevations above ground level over Wilderness areas. See, for example, Final Environmental Assessment for Proposed to the New York National Guard Adirondack Range Air Space Modifications, section 3.5.1 and Figures 3.5-1a through 3.5-2e, table 3-5.1 and Chapter 7. Figure 3-6 depicting "Airspace Designations and Noise Sensitive Areas" also does not reflect the sensitive nature of the Adirondack Park (and other public lands within the Action Area). The general descriptions of the exercises and lack of information regarding particular locations and flight routes make it difficult to determine the significance of potential adverse environmental effects of the increased training.	Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require EIS. As we work through the process we will continue to plan for measures that will avoid and or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions.
3	33	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The location of encampments will have concentrated impacts of noise, in particular, on adjacent areas. For example, if the Moore Airfield in St. Lawrence County, which is inside the Adirondack Park, is used as a regular location of six exercises a year, the potential exists for a significant increase in impacts of helicopter noise and visibility on Forest Preserve lands in the area.	Agreed, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
3	34	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	If low-level flights are expected to take place at elevations and in locations that vary from previously assessed activities, issuance of a FNSI (Finding of No Significant Impact) would not be appropriate given the potential impacts.	Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require EIS. As we work through the process we will continue to plan for measures that will avoid and or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions.

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Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
3	35	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The Attributes for Consideration listed in Table FNSI-1 provide a thorough framework for evaluating potentially suitable sites for events. After reviewing the Attributes for Consideration, we believe that WMAs would generally be poorly suited for these proposed operations. While many WMAs have field areas within the listed size parameters of the PEA, many are also home to both breeding and overwintering threatened and endangered species where we have invested significant federal funds for habitat creation, improvement, and management. Another attribute is to avoid known occurrence locations of threatened and endangered species. As previously noted, many of our WMAs are habitat for threatened and endangered species.	The selection of the sites would be based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans. Also, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
3	36	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Table FNSI-2 notes that if public lands are used, the Army will avoid peak use times by groups such as hunters, anglers, and boaters. WMAs exist for many reasons including to provide wildlife-dependent recreation such as hunting and trapping (see Public Use of Wildlife Management Areas at <a href="http://www.dec.ny.gov/docs/wildlife_pdf/publicuseofwmas.pdf">http://www.dec.ny.gov/docs/wildlife_pdf/publicuseofwmas.pdf</a> ). The affected region is home to a diversity of game species and as such, has hunting and trapping seasons spanning from September through May of each year. The remaining months of the year are peak breeding and young-rearing periods for most wildlife species. Considering just these criteria, most WMAs in the region would not be compatible with the type or level of use proposed. Further review and analysis of specific WMA properties could be conducted once the details of the operations are known. Factors such as timing, number of personnel, number of vehicles, number of aircraft, and frequency of use would be key to determining potential impacts to wildlife and their habitats. Public use of these properties occurs year-round to some degree; however, the most significant occurs near populated areas, particularly Onondaga County and the western and south eastern portions of Oswego County. In these areas, use of these properties for military training would likely cause concern with members of the public as this is not an activity that they would be accustomed to.	The selection of the sites would be based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans. Also, Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
3	37	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The same concerns expressed about use of WMAs could also apply to use of private lands as well, dependent on location. Figure 3-10 of the PEA demonstrates how challenging it will be to locate a site in Region 6 where suitable site conditions can be found and threatened and endangered species do not exist. As with WMAs, we would be happy to conduct further analysis and review of specific private properties once the additional details listed above are known.	The selection of the sites would be based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans. Additionally, the use of private lands will be coordinated with the land owners and appropriate permits obtained if necessary.
3	38	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	As the PEA notes, there is significant potential for negative impacts to many wildlife species as a result of these proposed operations. The severity and duration of these impacts are dependent on operation specifics such as area of interest, timing, duration, number of personnel, frequency of use, and the type and number of vehicles and/or aircraft used. Potential impacts could include incidental take of species or nests via motor vehicle strike, aircraft strike, rotor wash, or trampling by ground personnel. Taking could also occur via habitat loss and temporary or permanent displacement of species. A more definitive determination of potential impacts to wildlife can be provided once specific properties for proposed operations are identified.	Site specific conservation measures to avoid impacts to wildlife, including threatened and endangered species, would be developed in consultation with USFWS and NYSDEC at the time of site selection. A full analysis of impacts to species could be conducted at that time.

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Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
3	39	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The proposed activities within the action area may require state Uniform Permit Act actions. The proposal included several avoidance measures to limit the necessity of obtaining those permits. However, incorporation of this framework would aid future site selection processes.	If State Uniform Permit Act actions are required, Fort Drum will coordinate and obtain all necessary permits. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions.
3	40	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	For areas outside the Adirondack Park, a state freshwater wetlands permit under 6 NYC RR Part 663 would be required if the proposed activities occur within 100' of a wetland delineated using state protocols. The PEA stated a 200' buffer would be incorporated into the site selection process obviating the need for state wetland permitting.	Acknowledged. Part of the site selection criteria is to avoid all wetlands; therefore a permit would not be required. If during site selection, wetlands cannot be avoided a state freshwater wetlands permit would be obtained.
3	41	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Similarly, any disturbance to the bed or banks of protected water courses; or fill/excavation in a navigable waterbody would require 6 NYCRR Part 608 Protection of Waters permits. Although the action proposes to use upland sites and avoid watercourses, we recognize there may be a need to provide access roads across headwater streams.	Acknowledged. Coordination with appropriate agencies would occur and permits obtained, in compliance with 6 NYCRR Part 608, if necessary. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions.
3	42	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The Clean Water Act Section 401 Water Quality Certification would be necessary if a determination was made that a federal Section 404 action was required.	Acknowledged. Coordination with appropriate agencies would occur and permits obtained, in compliance with CWA section 404.
3	43	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Several state-designated Wild, Scenic and Recreational Rivers exist within the action area. The state regulation would require a permit under 6 NYCRR Part 666 if the off-base ground exercise areas are located within 1/2 mile of the designated river segment.	Acknowledged. Coordination with appropriate agencies would occur and permits obtained, in compliance with 6 NYCRR Part 666.
3	44	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	The proposed action included a listing of the training activities; among these were hand-digging small grey water soakage pits for food service washing and water purification. These activities may require a State Pollution Discharge Elimination System (SPDES) permit under 6 NYCRR Part 750. We have permitted specific locations for use of Tactical Water Purification Systems (TWPS) for training activities on-post for their backwash wastewater. Additional information will be necessary for jurisdictional evaluation of the use of seepage pits.	Acknowledged. Coordination with appropriate agencies would occur and permits obtained, in compliance with 6 NYCRR Part 750.
3	45	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	Coverage under the state SPDES General Permit for Stormwater Discharges Associated with Construction Activities is necessary if the proposed disturbance at the off-post ground training exercise areas is greater than one acre. As noted, the development of the Stormwater Pollution Prevention Plan is a requirement of that permit.	Acknowledged. Coordination with appropriate agencies would occur and SPDES permits obtained, in compliance with 6 NYCRR Part 750. If the proposed disturbance at the off-post ground training exercise areas is greater than one acre, the development of the Stormwater Pollution Prevention Plan will be completed.
3	46	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	NYS regulations provide for a permitting system for the take of any threatened or endangered species or their occupied habitat under 6 NYC RR part 182. A permit may still be required even if avoidance and minimization measures are incorporated into the site selection process. The greatest potential for this would be for grassland bird species based on the general site selection criteria.	Site specific conservation measures to avoid impacts to wildlife, including threatened and endangered species, would be developed in consultation with USFWS and NYSDEC at the time of site selection. Fort Drum would acquire any necessary permits prior to implementation of the proposed action and would fully comply with all permit conditions and regulatory requirements.

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Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column2
3	47	New York State Department of Environmental Conservation (NYSDEC)	Randall	Young	Regional Director	DEC requests that this additional information be discussed and provided so that it can properly evaluate the plan and determine whether the plan as developed will trigger the need for an EIS (instead of issuing a FNSI).	Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require EIS. As we work through the process we will continue to plan for measures that will avoid and or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions.
4	1	U.S. Fish and Wildlife Service	Robyn	Niver	Endangered Species Biologist	Page 13, Section 2.2 - It would be helpful to include a better description of the general types of activities that are anticipated to occur on the ground. For example, are smoke operations part of ground support activities? Given the limited description it is difficult to provide comments regarding most of the subsequent analyses. I understand that this is programmatic in nature and perhaps those additional details are going to be provided in the tiered NEPA documents but if they are generally known now, it would be helpful to include.	Acknowledged. Use of smoke and obscurants is not anticipated for off-post activities, with exception of emergency signaling procedures that would be determined in site approval process. Detailed descriptions of ground support exercises could include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas.
4	2	U.S. Fish and Wildlife Service	Robyn	Niver	Endangered Species Biologist	Page 28, Section 3.1.2 - What is the definition of "protected lands"? If training is not occurring on parks or protected lands but is occurring on public lands - what kind of public lands does this mean? Aren't public lands protected to some degree? This is just a confusing section.	Protected lands have been deleted from the PEA.
4	3	U.S. Fish and Wildlife Service	Robyn	Niver	Endangered Species Biologist	Page 48, Table 3-8 - It is unclear where the information came from to populate this table. For example, there are known hibernacula for Indiana bats and northern long-eared bats (NLEB) in the action area. Also, there are no flocks of piping plovers along Lake Ontario but we have had 1-2 nesting pairs with chicks in the last several years and sometimes another 1-2 birds during migration events. The word "small" should be removed when describing bog turtle populations in Oswego County.	Table 3-8 was revised to include the information on bats and piping plover provided in the USFWS comment letter. Sources are cited within Table 3-8.
4	4	U.S. Fish and Wildlife Service	Robyn	Niver	Endangered Species Biologist	Page 51, Table 3-9 - The first example conservation measure for the NLEB doesn't avoid impacts but seems to comply with the 4(d) rule. The smoke and obscurants bullet raises questions about whether smoke should be analyzed throughout the document for health, etc. The statement that the NLEB bullets apply for the Indiana bat is not correct as the first NLEB bullet is designed to ensure compliance with the NLEB 4(d) rule and would not avoid impacts to Indiana bats. The two piping plover bullets cannot be used together - one suggests full avoidance and the other suggest some impacts but just not during the nesting season. Given that there are few bog turtle and Eastern massasauga (EMR) locations, it seems like they can be completed avoided and that is the only bullet needed for these 2 species (similar to American hart's-tongue fern). Avoiding training during the active season is not sufficient for bog turtles and EMR and those example measures should be deleted.	The PEA has been revised to remove references to smoke because use of smoke and obscurants is not anticipated for off-post activities, with exception of emergency signaling procedures.

Fort Drum PEA Public Review COMMENT/RESPONSE - Public Comments

Commenter Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column1
1	1	Adirondack Council	John	Sheehan	Director of Communications	We note with some disappointment that there was no attempt to convene this group – via teleconference or other means -- to provide feedback this time before the Fort offered a formal proposal for public comment. We did attend the helicopter demonstration at the Fort in April of 2018, along with a few dozen others, but that was the last communication on the subject. We firmly believe that this process has avoided many conflicts in the past, and made it possible to maintain communications prior to and throughout the training exercises, to ensure transparency and prevent adverse reactions. We urge you to consult past commanders regarding their positive experiences and return to this highly successful model in any subsequent proposals.	Fort Drum acknowledges the Adirondack Council's desire for open dialog and transparency. To help achieve this objective Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas
1	2	Adirondack Council	John	Sheehan	Director of Communications	In the current plan, as in past plans, we urge the Army to be cautious with the unique natural resources of the Adirondack Park, and seek locations that are resilient enough to withstand the impacts of the helicopter and troop movements, and avoid conflicts with wildlife -- and with other users in areas of the Park that are already overcrowded with visitors.	The selection of the sites would be based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
1	3	Adirondack Council	John	Sheehan	Director of Communications	The Army cites COVID-19 as the reason it didn’t hold public outreach sessions for this proposal, which is understandable, but isn’t an excuse for not holding conference calls with stakeholders or conducting on-line outreach.	Fort Drum agrees with the Adirondack Council that conference calls, virtual meetings and similar communication techniques can be used during the pandemic when public gatherings are not possible. The recently formed Ad Hoc Committee held meetings using MS TEAMS, precisely the type of stakeholder communication recommended by the Adirondack Council. Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts.
1	4	Adirondack Council	John	Sheehan	Director of Communications	Due to travel restrictions and the Adirondack Park’s proximity to the major cities of the Northeast, we have seen in 2020 a record-breaking surge in the number of visitors to the park’s Forest Preserve. Consequently, we urge the Army to prepare for just two missions in this plan, rather than six. This will help avoid the spread of the disease, while providing the state with time to assess the impacts, as it also copes with managing the crowds and an already-strained search-and-rescue network in the Park.	Acknowledged and agreed. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts. Monitoring of sites by Fort Drum environmental staff will occur to ensure cumulative impacts do not happen. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum’s decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
1	5	Adirondack Council	John	Sheehan	Director of Communications	We note (and hope to have confirmation from the Army) that the precautions you describe preclude the Army from using the Adirondack Forest Preserve for any of the two or six intensive training missions it seeks permission to undertake. We would support this conclusion, given that the Army’s needs for the staging area also appear to preclude any use of Adirondack Forest Preserve.	Acknowledged and agreed. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts. Monitoring of sites by Fort Drum environmental staff will occur to ensure cumulative impacts do not happen. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum’s decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).



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1	6	Adirondack Council	John	Sheehan	Director of Communications	In addition, the plan notes that the Army will “avoid properties and sites listed on the National Register of Historic Properties.” Please note that the entire Forest Preserve is a National Landmark, which should afford it even greater protection from disturbance than an historic site.	The PEA has been revised to add that the Adirondack Forest Preserve is on the NRHP as a National Historic Landmark. It was also revised to note that during consultation, the SHPO stated that no historic properties, including archaeological and/or historic resources, will be significantly impacted by this undertaking with the implementation of the Best Management Practices and Compliance Measures for Alternatives 1 and 2. Once specific training sites are selected, the appropriate level of environmental documentation for the site specific action would be prepared by Fort Drum and the SHPO will be consulted during that environmental review process to provide input; as well as review cultural resource impacts.
1	7	Adirondack Council	John	Sheehan	Director of Communications	Avoiding the Forest Preserve would aid the Army in achieving its goal to avoid disturbing threatened or endangered species and avoid impacts to other native wildlife.	Agreed. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas). The selection of the sites would be based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans.
1	8	Adirondack Council	John	Sheehan	Director of Communications	So, in your efforts to seek a private-land site for your exercises, we are pleased to see the Army will consult with the U.S. Fish and Wildlife Service and NYS DEC. We recommend it also work with the Adirondack Park Agency, which administers the Adirondack Park State Land Master Plan as well as the Adirondack Park Private Land Use and Development Plan.	Fort Drum respects the role of the Adirondack Park Agency including its responsibilities for administering the Adirondack Park State Land Master Plan as well as the Adirondack Park Private Land Use and Development Plan. The Adirondack Park Agency was invited and participated in the Ad Hoc Committee that assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
2	1	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require EIS. As we work through the process we believe we can get to a finding of no significant impact through avoidance and/or minimize such impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions.
2	2	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies (including the NYSDEC, and APA), Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).

Fort Drum PEA Public Review COMMENT/RESPONSE - Public Comments

Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column1
2	3	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	The PEA has been updated to include the additional recreation activities that take place within the Adirondack Park. The selection of sites would be based on consultation or coordination with the appropriate regulatory agencies and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans. Coordination with the appropriate agencies will ensure impacts to recreational activities and public lands are minimal. Fort Drum formed an Ad Hoc Committee, that included the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee. When a site is selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures.
2	4	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Adirondack Mountain Club was invited and participated on the Committee that assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential training locations. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum's decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
2	5	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Adirondack Mountain Club was invited and participated on the Committee that assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential training locations. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum's decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
2	6	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Adirondack Mountain Club was invited and participated on the Committee that assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential training locations. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum's decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).

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2	7	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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 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.	Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require EIS. As we work through the process we will continue to plan for measures that will avoid and or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions.
2	8	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	Fort Drum respects the role of the Adirondack Park Agency as a stakeholder and its jurisdiction over wetlands located in the Adirondack Park. The selection of the sites would be based on consultation or coordination with the appropriate regulatory agencies and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans. For specific site selection, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies. Training does not typically occur in or on surface waters, floodplains, wetlands, water supplies, or designated water systems (e.g., wellhead protection areas).
2	9	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	The PEA was revised to make it clear that Alternative 2 proposes two high-level training events per year. Alternative 1 proposes six high-level training events per year. Alternative 3 the current limited and small off-post training exercises using temporary off-post locations to support leader development and training scenarios, use of training aids (such as on-board training devices and hand held emitters), and temporary sustainment sites (such as food/water supply and fuel points) that occur during on-post large-scale training exercises would continue.
2	10	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	The PEA was revised to make it clear that Alternative 2 proposes two high-level training events per year. Alternative 1 proposes six high-level training events per year.

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2	11	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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.	Fort Drum agrees with the Adirondack Council that conference calls, virtual meetings and similar communication techniques can be used during the pandemic when large gatherings are not possible or advisable. The recently formed Ad Hoc Committee is an example of such effective stakeholder communication. Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts.
2	12	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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	The PEA has been revised to add that the Adirondack Forest Preserve is on the NRHP as a National Historic Landmark. It will also be added that during consultation, the SHPO stated that no historic properties, including archaeological and/or historic resources, will be significantly impacted by this undertaking with the implementation of the Best Management Practices and Compliance Measures for Alternatives 1 and 2. When locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize cultural resource impacts based on consultation or coordination with the appropriate regulatory agencies, including the NYSHPO and APA. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
2	13	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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	Fort Drum agrees with the Adirondack Mountain Club that significance cannot be avoided by terming an action temporarily or by breaking it down into small components. However, Fort Drum does not believe that the sum of all environmental impacts resulting from all training excersises under the selected alternative will rise to a level of cummulative impact that is considered significant. Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. For specific site selection, Fort Drum will prepare an appropriate level of environmental documentation and avoid and/or minimize such impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Also, the Adirondack Mountain Club was invited and participated in the Ad Hoc Committee that assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
2	14	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	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 interests 110 of the region including the regional economy which is highly dependent on year-round outdoor recreation. These impacts will be cumulative.	The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts. Monitoring of sites by Fort Drum environmental staff will occur to ensure cumulative impacts do not happen. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum's decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).

Fort Drum PEA Public Review COMMENT/RESPONSE - Public Comments

Commenter Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column1
2	15	Adirondack Mountain Club	Michael / Cathy	Barrett / Pedler	Executive Director / Director of Advocacy	When determining the significance of the impact of a proposed action 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.	The PEA has been revised to add that the Adirondack Forest Preserve is on the NRHP as a National Historic Landmark. It was also revised to note that during consultation, the SHPO stated that no historic properties, including archaeological and/or historic resources, will be significantly impacted by this undertaking with the implementation of the Best Management Practices and Compliance Measures for Alternatives 1 and 2. The selection of the sites will be based on consultation or coordination with the appropriate regulatory agencies, to include SHPO, and through permit conditions, to avoid or minimize impacts to natural, cultural, and physical resources and humans. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	1	Adirondack Wild: Friends of the Forest Preserve	David	Gibson	Managing Partner	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.	The PEA has been updated to reflect the Adirondack Park, and the definitions for public and private lands in the Adirondack Park. Fort Drum is working on the formation of an Ad Hoc Committee and will include the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	2	Adirondack Wild: Friends of the Forest Preserve	David	Gibson	Managing Partner	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.	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts. Training sites will not be selected within Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	3	Adirondack Wild: Friends of the Forest Preserve	David	Gibson	Managing Partner	<p>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.</p> <p>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.</p>	The PEA has been updated to reflect the Adirondack Park, and the definitions for public and private lands in and outside the Adirondack Park. Fort Drum formed an Ad Hoc Committee that included the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures. Training sites will not be selected on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).

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3	4	Adirondack Wild: Friends of the Forest Preserve	David	Gibson	Managing Partner	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.	Thank you for your comment. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. Impacts (cumulative or otherwise) have been minimized by Fort Drum's decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
3	5	Adirondack Wild: Friends of the Forest Preserve	David	Gibson	Managing Partner	<p>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.</p> <p>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.</p>	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used consecutively and training will be rotated amongst sites to limit impacts.
4	1	N/A	Deborah	Pierce	N/A	As a landowner and equestrian using the Otter Creek System, I disagree with the negative FONSI. I would invite any of the pilots flying "low and slow" over the trails to come out and ride with me while a training exercise is taking place overhead. We are local to the area and our horses are used to helicopters and jets flying overhead. However, when riding an 1100 pound prey animal through the woods and a low level jet flies directly over, all bets are off. I have had the experience several times myself and many other riders have as well. I can't think of any other activity, sport or otherwise, that is so dramatically affected by these low level flights.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .
4	2	N/A	Deborah	Pierce	N/A	Riding at Otter Creek is often a family event. The Assembly Area is filled with horse trailers and campers every summer - families that include grandparents down to toddlers. The horses are stalled in tie stalls at the Assembly Area and often the owners are in the stalls taking care of the horses. A jet flying low spooks even the most well-trained horse and can cause severe injuries even if not being ridden.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .
4	3	N/A	Deborah	Pierce	N/A	One of the worst parts about the flights is that we don't know when the planes, which are often flying over the trails, are going to fly at a low level.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .
4	4	N/A	Deborah	Pierce	N/A	I would very much appreciate your consideration of my request and I would also ask that one of the committee members contact me to discuss.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .

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4	5	N/A	Deborah	Pierce	N/A	As an example of the distance from the trails that makes a big difference: my husband and I were riding on a trail that is approximately 3 miles from our property when a low level flight went directly over our camp. It was loud in the woods but not enough to spook the horses terribly. A 5 mile avoidance area around the trails would ensure that most horses are not spooked to the point of bolting through the woods.	It appears that your comments pertain to noise created by jets (fixed wing aircraft) that are under the command and control of other military Services and not rotary winged aircraft that originate from Fort Drum. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> . If the concern is in fact rotary winged aircraft originating from Fort Drum, every effort will be made to avoid low level flight of the area in question when the trails are being used for equestrian recreational purposes. More information may be required on the exact location of these trails so that they can be avoided.
4	6	N/A	Deborah	Pierce	N/A	The Friends of Otter Creek Horse Trails are a group of volunteers dedicated to assisting the NYS Dept. of Environmental Conservation in maintaining and improving the horse trails. The group can provide any additional information that might be of assistance.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .
5	1	Advocate Drum	Thomas	Carman	Chair	Advocate Drum and the North Country Community enthusiastically support the proposed increase in the air and land-based training activities conducted by the 10th Combat Aviation Brigade and the 10th Sustainment Brigade within the Local Flying Area of Fort Drum, New York.	Thank you. Fort Drum appreciates the support of Advocate Drum and the North Country Community for our Soldiers and Fort Drum.
5	2	Advocate Drum	Thomas	Carman	Chair	We support the Army's need to ensure the aviators of the 10th CAB and support units of the 10th Sustainment Brigade are provided with practical and realistic flight proficiency and support services training. This proposed action to ensure our national security is essential to prepare and protect our Soldiers in the current military environment.	Thank you. Fort Drum appreciates the support of Advocate Drum and the North Country Community for our Soldiers and Fort Drum.
6	1	N/A	Roselyn	Taylor	N/A	I am writing to express my deep concern for the safety of people and horses in regard to jets flying over the NYS Trails at Otter Creek. There are ten barns that hold about twelve horses each along with riders and visitors which could number in the hundreds. Medical support is provided by volunteers with basic equipment. There is one hospital in Lowville. Helicopters are not nearby.	It appears that your comments pertain to noise created by jets (fixed wing aircraft) that are under the command and control of other military Services and not rotary winged aircraft that originate from Fort Drum. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> . If the concern is in fact rotary winged aircraft originating from Fort Drum, every effort will be made to avoid low level flight of the area in question when the trails are being used for equestrian recreational purposes. More information may be required on the exact location of these trails so that they can be avoided.
6	2	N/A	Roselyn	Taylor	N/A	There have been many other accidents due to the noise and the low-flying, huge jets. You can have a completely trained horse and it can bolt when these jets fly so low.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .

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6	3	N/A	Roselyn	Taylor	N/A	It really hurts my ears, especially when they make the BOOM sound.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .
6	4	N/A	Roselyn	Taylor	N/A	The horses can be injured when they are in a tie stall. I have seen injuries from them rearing and hitting their heads on beams.	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .
6	5	N/A	Roselyn	Taylor	N/A	I urge the people conducting the impact study to look closely at the accidents the jets have caused. They may want to review accident records the NYS Dept. of Environmental Conservation may have. There is an office in Lowville (Region 6).	Thank you for your comment. There are no jets or planes stationed at Fort Drum. This PEA concerns only helicopters and ground support activities. For information on aircraft noise <a href="https://www.faa.gov/noise/inquiries/">https://www.faa.gov/noise/inquiries/</a> For information on Low-Level Military Aircraft Flights in the Adirondack Park Region and phone number for noise complaints visit <a href="http://dmna.ny.gov/community/low_aircraft.html">http://dmna.ny.gov/community/low_aircraft.html</a> . Phone numbers for noise and public disturbance complaints visit <a href="https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints">https://home.army.mil/drum/index.php/about/Garrison/public-affairs/noise-complaints</a> .
7	1	Protect the Adirondacks	Peter	Bauer	Executive Director	The impacts associated with these events would be significant. The PEA states: Temporary off-post locations would be used in support of training scenarios, training aids (i.e., training emitters during division exercises for aviation detection), and temporary sustainment sites (e.g., providing food, water, sleep area, shower, fuel, communications). Sustainment sites would include tent structures for sleeping, meetings, meals, and maintenance of equipment. Other areas within the sustainment sites would include generators, fuel containers, fuel dis-pensing trucks, food kitchen, storage containers, and parking areas for supply trucks. (p FNSI-ii)	Fort Drum does not believe that the impacts resulting from training exercises will rise to a level that is considered significant. A process has been established going forward that will ensure significant impacts do not result. Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies, Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is completed when those sites are proposed for training events. The PEA has been revised to clarify that sites will not be used more than once in any given year and sites will not be selected on Adirondack Forest Preserve Lands (wilderness, wild forest, primitive, and canoe area).
7	2	Protect the Adirondacks	Peter	Bauer	Executive Director	Most important, Alternatives 1 and 2 call for use of cleared areas of 5 to 10 acres and that these areas must be free of trees. Such cleared areas are not widespread in the Forest Preserve in the six counties listed in the PEA, or anywhere else for that matter.	There is no intention to cut trees or clear lands to accommodate training unless by mutual agreement at the request of the landowner for mutual benefit to the landowner and the Army.
7	3	Protect the Adirondacks	Peter	Bauer	Executive Director	After review of the Programmatic Environmental Assessment for "Fort Drum 10th Mountain Combat Aviation Brigade and 10th Sustainment Brigade Mission and Training Activities," Protect the Adirondacks does not agree with the draft finding of no significant impacts. The PEA fails to adequately address the history, laws, and constitutional protections of the Forest Preserve in the Adirondack Park. The PEA outlines suitable areas for its proposed training activities in "Table FNSI-1 Criteria for Selecting Possible Exercise Locations/" which details suitable sites of 5 to 10 acres in size. Four criterion in Table FNSI-1 make use of the Forest Preserve unsuitable.	Agreed. Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).



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7	4	Protect the Adirondacks	Peter	Bauer	Executive Director	The "Vegetative Cover" criterion calls for "Preferably grass, fields with few to no trees or shrubs." There are very few such places, if any, in the Forest Preserve with "few to no trees." Please note that campers in the Forest Preserve must use only dead and downed wood for camp fires; no standing live or dead trees are allowed to be used. Campers are fined for cutting standing trees. There is also a significant body of case law that bars the "destruction" of trees on the Forest Preserve because the New York Constitution specifically protects Forest Preserve trees against destruction. Here1s Article 14, Section 1, of the State Constitution: The lands of the state, now owned or hereafter acquired, constituting the forest preserve as now fixed by law, shall be forever kept as wild forest lands. They shall not be leased, sold or ex-changed, or be taken by any corporation, public or private, nor shall the timber thereon be sold, removed or destroyed.	Agreed. Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	5	Protect the Adirondacks	Peter	Bauer	Executive Director	Under the State Constitution, trees cannot be cut down or cleared to create a 5 to 10 acre clearings to facilitate the proposed activities in the PEA for Alternatives 1 and 2.	There is no intention to cut trees or clear lands to accommodate training unless by mutual agreement at the request of the landowner for mutual benefit to the landowner and the Army.
7	6	Protect the Adirondacks	Peter	Bauer	Executive Director	The "Soil Type" criterion calls for ({Well-drained and dry (no wetlands or floodplains); loam or clay soils without a lot of rocks; avoid prime farmland." Such sites will be difficult, if not impossible, to locate on the Forest Preserve. The "Land Ownership" criterion calls for "Public lands with signed Memorandum of Agreement or private land with a lease agreement; avoid protected lands, parks and recreation areas, if possible." The Forest Preserve, in its essence, is "protected lands" where public recreation is a high value. The "Cultural Resources" criterion calls for avoiding "properties and sites listed on the National Register of Historic Properties; avoid Tribal land." It's important to the note that the entire public Forest Preserve in New York State is listed on the National Register of Historic Places.	Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	7	Protect the Adirondacks	Peter	Bauer	Executive Director	There's a case to be made that two other criterion, "Wetlands" and "Threatened or Endangered Species" also pose major obstacles, but it's clear that four criterion clearly make the Forest Preserve unsuitable for proposed training activities. Based on the criteria in Table FNSI-1 the Forest Preserve is unsuitable for proposed activities detailed in the PEA for Alternatives 1 and 2.	There is no intention to conduct training in wetlands or to disturb threatened or endangered species and training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	8	Protect the Adirondacks	Peter	Bauer	Executive Director	"Table FNSI-2 Summary of Environmental Impacts" lists 10 "resources." Protect the Adirondacks believes that it is highly likely that the activities proposed in Alternatives 1 and 2 would negatively impact three of the 10 resources listed.  First, the "Land Use" resources calls for "Because training is temporary, any impacts to land use would be short-term in nature. Schools, churches, and populated areas would be avoided. It is recommended if parks and recreation areas are used, they are avoided during peak times (hunting, fishing, and boat-ing seasons). Coordination with owner would occur prior to the start of training exercises. Impacts to land use would be adverse, short-term and minor as no permanent changes to designated land uses would be made. Tiered NEPA analysis would determine the impact once sites have been selected." This is a broad category. The Forest Preserve units in the six counties referenced in the PEA (St. Lawrence, Lewis, Oneida, Herkimer, Hamilton, Essex) are used by the public for outdoor recreation nearly con-tinuously. Please note that in an average calendar year in New York, the fishing season begins on April 1 <sup>st</sup> with later start dates for different species. Some fishing seasons close in the fall, others continue through March 15th because of the popularity of winter ice fishing. Hunting seasons start in late Sep-tember and run through December. Trapping seasons start in the fall and many run through the winter into March.	Site specific conservation measures would be developed in consultation with NYSDEC at the time of site selection and may include seasonal restrictions to avoid or minimize impacts on recreation based on consultation or coordination with the appropriate regulatory agencies, including NYSDEC and APA.  Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	9	Protect the Adirondacks	Peter	Bauer	Executive Director	Outdoor public recreation intensifies in the spring in May with active hiking, camping, and mountain biking and runs deep into the fall. Winter hiking, snowshoeing, cross-country skiing, and camping are also popular and run through the winter into late March. Snowmobiling is popular and begins at the end of hunting season in December and runs through the winter into March.  In short, there are few times of the year that the proposed activities detailed in Alternatives 1 and 2 will not have negative impacts on land use, mostly on the millions who use the Forest Preserve for a variety of outdoor recreational activities.	Site specific conservation measures would be developed in consultation with NYSDEC at the time of site selection and may include seasonal restrictions to avoid or minimize impacts on recreation based on consultation or coordination with the appropriate regulatory agencies, including NYSDEC and APA.  Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).

Fort Drum PEA Public Review COMMENT/RESPONSE - Public Comments

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7	10	Protect the Adirondacks	Peter	Bauer	Executive Director	Second, Table 2 lists "Noise" and states" Training exercises are short-term. Helicopter overflights associated with the training exercises would be infrequent and of a short duration. Aviators are instructed to avoid flyovers of residential areas, known wildlife refuges, and livestock. For areas where aviators takeoff, land, and hover, and during engine run-ups, receivers of noise may experience additional disturbances. The number and amount of disturbances will also be dependent on the number of aircraft involved in the training exercises. Therefore, noise impacts on human annoyance and domestic animals would be adverse, short-term, and range from negligible to minor. Noise impacts on wildlife would be adverse, short-term, and range from negligible to moderate." We note that while there is considerable information on noise generated by different helicopters and motor vehicles, the literature cited by the PEA on wildlife impacts is two decades old and not specifically related the terrain and habitat of the Northeast U.S. Moreover, there is little about noise intrusions into public Wilderness where quiet, interrupted only by the sounds of wild nature, dominates and is one of the virtues of Wilderness. Due to the limited amount of information in the PEA, it's impossible to assess noise impacts from the training activities proposed in Alternatives 1 and 2. Much more information is necessary.	Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. In addition, impacts have been minimized by Fort Drum's decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas). Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies (including the NYSDEC, and APA), Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
7	11	Protect the Adirondacks	Peter	Bauer	Executive Director	Third, as discussed above, we believe that the "biological" resources would experience long-term negative impacts due to tree cutting to create 5 to 10 acre clearings. "Biological Resources" in Table FNSI-2 calls for "Training activities would result in adverse, short- and long-term, negligible to moderate impacts to biological resources. Impacts could include removal of vegetation from clearing, crushing, or trampling; spreading of invasive species from soil disturbances; and disturbances to wildlife, including threatened or endangered species, and habitats from noise and visual disturbances during training ex-ercises. There could also be long-term impacts from habitat alteration, mortality of individual animals, or destruction of nests and eggs of ground-nesting birds. Implementing appropriate conservation mea-sures and terms and conditions and following permit conditions would ensure that adverse impacts are avoided, minimized, or mitigated as necessary. Final conservation measures would be developed in consultation with USFWS and NYSDEC at the time of site selection." Clearly, "removal of vegetation from clearing, crushing, or trampling" of trees is prohibited by the State Constitution. Furthermore, cut-ting of trees is long-term damage.	There is no intention to cut trees or clear lands to accommodate training unless by mutual agreement at the request of the landowner for mutual benefit to the landowner and the Army. Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	12	Protect the Adirondacks	Peter	Bauer	Executive Director	Fourth, under "Cultural Resources" Table FNSI-2 calls for "Known historic resources would be avoided. However, training exercises have the potential to impact unknown archaeological resources. BMPs would be followed to ensure impacts to cultural resources remain minor. Impacts to cultural resources would be adverse, short- or long-term and minor to moderate." As stated above, the Forest Preserve is listed on the National Register of Historic Places.	There is no intention to conduct training cultural/archaeological resources and training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	13	Protect the Adirondacks	Peter	Bauer	Executive Director	Contrary to statements in the PEA, Protect the Adirondacks finds that there could be longstanding negative environmental impacts to the resources on the public Forest Preserve.	Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	14	Protect the Adirondacks	Peter	Bauer	Executive Director	It is our belief that some of the actions detailed in Alternatives 1 and 2 in the PEA will require permits from the Adirondack Park Agency (APA) or amendments to the Adirondack Park State Land Master Plan (APSLMP), which sets out the rules and regulations for the public Forest Preserve. It is also our understanding that the APA has requested additional information because the PEA contains insufficient informa-tion for it to evaluate the full range of impacts.	Fort Drum formed an Ad Hoc Committee to develop innovative coordination procedures for locating, coordinating reviews for approval, establishing, using and restoring potential training locations, and determining types of land use agreements appropriate for future off-post training missions. Fort Drum invited Army, Federal and State Agencies (including the NYSDEC, and APA), Stakeholder Organizations/Groups, Indian Nation Partners, and interested parties, that commented on the document to participate with resolving comments through discussion. The group assisted with the development of a procedure to use to coordinate site selection and approvals from appropriate authorities for potential locations for ground support exercises to include but not limited to short term training emitter sites, unit support areas (food, fuel, generators, tents, maintenance, communications), and helicopter landing and support areas. When sites are identified, Fort Drum will ensure the appropriate environmental review is conducted when those sites are proposed for training events.
7	15	Protect the Adirondacks	Peter	Bauer	Executive Director	In New York, the Forest Preserve is jointly managed by the APA and the Department of Environmental Conservation. We have requested, but not yet received, DEC's comments on the PEA. The PEA appears not to fully understand the dual-management roles of the APA and DEC on the public Forest Preserve.	Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).

Fort Drum PEA Public Review COMMENT/RESPONSE - Public Comments

Commenter Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column1
7	16	Protect the Adirondacks	Peter	Bauer	Executive Director	The sheer scope of the proposed trainings on public lands totaling 126 days of air and on-ground motor vehicle activities requires a full EIS. This is necessary for regulatory agencies to fully assess the range of impacts.	Fort Drum's intent is to avoid or minimize impacts on natural, cultural, and physical resources and humans while facilitating training to fulfill the purpose and need for the proposed action. We do not believe there is a significant impact at this time to require EIS. As we work through the process we believe we can get to a finding of no significant impact through avoidance and/or minimize such impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Therefore, to identify potential areas where the proposed training could occur, the PEA applies site selection criteria that would avoid and/or minimize such impacts. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Alternative 2 has been selected which greatly reduces the maximum number of sites that will be trained on in a given year (maximum of two sites selected) further decreasing impact potential. In addition, impacts have been minimized by Fort Drum's decision to not select sites on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
7	17	Protect the Adirondacks	Peter	Bauer	Executive Director	It's unclear from the PEA whether a Freshwater Wetlands Act permit would be required from the APA. We note that wetlands are of high value and great abundance in the six counties listed in the PEA for possible locations in Alternatives 1 and 2. We also note that this type of project may involve the U.S. Army Corp of Engineers.	There is no intention to conduct training in wetlands or to disturb threatened or endangered species and training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	18	Protect the Adirondacks	Peter	Bauer	Executive Director	There are nearly 1.2 million acres of Wilderness in the Adirondack Park and five of the six counties referenced in the PEA as being partly or entirely with the Park have Wilderness. While the PEA references "wilderness" as existing in Herkimer and St. Lawrence counties (p 25) it fails to state that wilderness is major land area in Essex, Hamilton, and Lewis counties. A search of the PEA only found two references to Wilderness lands.	The PEA has been revised to include land designations/land use of Public and Privately owned land in the Park. Fort Drum will coordinate land use with appropriate agencies for lands and will not select sites for these events on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	19	Protect the Adirondacks	Peter	Bauer	Executive Director	The fundamental purpose of a Wilderness area is that it is a protected landscape where ecological processes are allowed to proceed unimpacted by humans to the greatest extent possible. As a result, human impacts are minimized to those caused by walking, paddling, or cross country skiing. A central tenet of Wilderness area management is the absence of motor vehicles or bicycles from a large land-scape. Wilderness areas by their basic definition are supposed to receive the lightest of impacts from human recreational activities. Additionally, Wilderness areas have group size limits that are well below the sizes of the training activities outlined in the PEA. The Adirondack Park State Land Master (APSLMP) articulates this purpose in its basic definition of Wilderness: A wilderness area, in contrast with those areas where man and his own works dominate the landscape, is an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. A wilderness area is further defined to mean an area of state land or water having a primeval character, without significant improve-ment or permanent human habitation, which is protected and managed so as to preserve, enhance and restore, where necessary, its natural conditions, and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substan-tially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least ten thousand acres of contiguous land and water or is of suffi-cient size and character as to make practicable its preservation and use in an unimpaired condi-tion; and (4) may also contain ecological, geological or other features of scientific, educational, scenic or historical value. (p 22)	The PEA has been updated to include the different land use designations for public and private lands inside the Adirondack Park and nine county action area. Fort Drum formed an Ad Hoc Committee, that included the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures. Training sites will not be selected within Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe areas).
7	20	Protect the Adirondacks	Peter	Bauer	Executive Director	The basic Wilderness definition states that lands classified as Wilderness should be managed in a wild, natural, untrammled state where any impacts or marks of humans are difficult to detect. Protect the Adirondacks finds that the scope of activities in the PEA are incompatible with Wilderness lands in the Adirondack Park. The Wilderness guidelines in the APSLMP, partly quoted above, simply do not allow the proposed activities in the PEA in Wilderness Areas.	The PEA has been revised to include land designations/land use of Public and Privately owned land in the Park. Fort Drum will coordinate land use with appropriate agencies for lands and will not select sites for these events on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).

Fort Drum PEA Public Review COMMENT/RESPONSE - Public Comments

Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column1
7	21	Protect the Adirondacks	Peter	Bauer	Executive Director	The APSLMP classifies the Forest Preserve into a number of different land use types. The APSLMP places a premium on natural resource protection: "If there is a unifying theme to the master plan, it is that the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded." (p 1)	The PEA has been updated to include the different land use designations for public and private lands inside the Adirondack Park and nine county action area. Fort Drum formed an Ad Hoc Committee, that included the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures.
7	22	Protect the Adirondacks	Peter	Bauer	Executive Director	In addition to Wilderness areas, the biggest Forest Preserve classification is "Wild Forest" which generally allows a higher degree and more intensive forms of outdoor recreation. Wild Forest areas, for example, allow motor vehicle use on roads and snowmobile use on designated snowmobile trails.	The PEA has been updated to include the different land use designations for public and private lands inside the Adirondack Park and nine county action area. Fort Drum formed an Ad Hoc Committee, that included the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures.
7	23	Protect the Adirondacks	Peter	Bauer	Executive Director	While motorized activities are authorized in Wild Forest areas, clearings of 5 to 10 acres do not exist. The PEA states that its field training activities require clearings of 5 to 10 acres and these would not be possible even in Wild Forest areas where some kinds of motor vehicle use is allowed.	The PEA has been updated to include the different land use designations for public and private lands inside the Adirondack Park and nine county action area. Fort Drum formed an Ad Hoc Committee, that included the Adirondack Park Agency and NYSDEC as part of that committee. Specific site selection would follow procedures developed by the Ad Hoc Committee and will avoid and/or minimize impacts based on consultation or coordination with the appropriate regulatory agencies, and through permit conditions. Once training locations are selected, Fort Drum will prepare an appropriate level of environmental documentation and coordinate with the appropriate agencies to incorporate avoidance and mitigation measures.
7	24	Protect the Adirondacks	Peter	Bauer	Executive Director	Article 14 and the State Constitution  The Adirondack Forest Preserve is protected by the State Constitution. Constitutional protections were provided to the Forest Preserve in Article 14, Section 1 at the 1894 Constitutional Convention (then Article 7, Section 7) and have remained unchanged ever since. The Constitutional protections for the Forest Preserve sets these lands apart from other public lands.	The PEA has been revised to include land designations/land use of Public and Privately owned land in the Park. Fort Drum will coordinate land use with appropriate agencies for lands and will not select sites for these events on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	25	Protect the Adirondacks	Peter	Bauer	Executive Director	We note that in the PEA there is only one mention of the State Constitution and its use is inaccurate: "Hamilton County lies entirely within the Adirondack Park and is the least populated county in New York. Because Hamilton County is located in the Adirondack Park, any development in the county is limited by the NYS Constitution, which protects the park land. Most of the park land is publicly owned. Hamilton County offers forested mountains, 77 major lakes, and countless plunging streams. The coun-ty has nine towns and one incorporated village. Tourism is the most important industry and the whole area is a favorite spot for vacationers and recreationalists." Development in Hamilton County on private lands is regulated jointly by the APA and local governments. The Forest Preserve, which is public land, is protected under the State Constitution and managed jointly by the APA and DEC.	The PEA has been revised to include land designations/land use of Public and Privately owned land in the Park. Fort Drum will coordinate land use with appropriate agencies for lands and will not select sites for these events on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	26	Protect the Adirondacks	Peter	Bauer	Executive Director	Here's Article 14, Section 1, of the State Constitution: The lands of the state, now owned or hereafter acquired, constituting the forest preserve as now fixed by law, shall be forever kept as wild forest lands. They shall not be leased, sold or ex-changed, or be taken by any corporation, public or private, nor shall the timber thereon be sold, removed or destroyed.	Training will not occur on Adirondack Forest Preserve Land (wilderness, wild forest, primitive, and canoe area).
7	27	Protect the Adirondacks	Peter	Bauer	Executive Director	Under the State Constitution, trees cannot be cut down or cleared to create a 5 to 10 acre clearing to facilitate the proposed activities in the PEA for Alternatives 1 and 2.	There is no intention to cut trees or clear lands to accommodate training unless by mutual agreement at the request of the landowner for mutual benefit to the landowner and the Army.
7	28	Protect the Adirondacks	Peter	Bauer	Executive Director	Stakeholder Group  Recent statements in the press and public correspondence announced some form of stakeholder group may be formed to help the 10th Mountain Division assess the viability of different locations in the North Country for training air and ground training activities. Protect be pleased to help with such an effort. We note that both the New York and Vermont Air National Guards successfully managed these types of public outreach efforts, which helped to both meet the national defense needs and protect the Adirondack Park.	Fort Drum acknowledges and thanks Protect the Adirondacks for your comment.

Fort Drum PEA Public Review COMMENT/RESPONSE - Public Comments

Committer Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Column1
7	29	Protect the Adirondacks	Peter	Bauer	Executive Director	<p>Recommendation</p> <p>The air and ground training activities outlined in the PEA will have a major impact on wild places where they are staged in the North Country. These activities are best suited for managed forestlands, such as State Forests and State Conservation Easements, that have the road infrastructure and open clearings required. These areas are also remote from residential areas and possess extensive open space tracts of tens of thousands of acres. The large conservation easements north of Route 3 in St. Lawrence County may be suitable to the proposed activities detailed in the PEA. Use of conservation easement lands should be evaluated.</p>	Fort Drum acknowledges and thanks Protect the Adirondacks for its recommendation considering the large conservations easements north of route 3 in St. Lawrence County. This area can certainly be considered during the future site selection process.
7	30	Protect the Adirondacks	Peter	Bauer	Executive Director	On behalf of the Board of Directors of Protect the Adirondacks, please accept these comments on proposed air and field training operations on public lands in the Adirondack Park and North County by the 10th Mountain Division of the US Army.	Thank you for our comments. Protect the Adirondacks support of the mission is appreciated.
8	1	NY Snowmobile Association	Dominic	Jacangelo	Executive Director	<p>The document identifies a nine county action area for consideration. The Tug Hill area in Lewis County, the western Adirondacks including Old Forge and St. Lawrence County are the biggest destination areas in New York State for snowmobiling.</p> <p>NYSSA believes the environmental assessment fails to identify a major recreational resource contained within that nine county action area. Within that area snowmobile clubs and municipalities build and maintain 3,298 miles of snowmobile trail on public and private land. You can visit <a href="https://webapps2.cgis-solutions.com/nysnowmobile/">https://webapps2.cgis-solutions.com/nysnowmobile/</a> to see exactly where these trails are located.</p> <p>It is our request that as individual sites are identified and considered for the training exercises as noted in the assessment, every effort would be made to avoid direct conflict with established snowmobile trails from mid-December to approximately April 15th when conditions put thousands of snowmobilers on this trail network each day.</p> <p>We are confident that with some advance thought the 10th Brigade will be able to accomplish their training with no impacts on our recreational activity that contributes to the winter economy of the action area. Please feel free to contact me if you have additional questions.</p>	Thank you for your comment. Official published snow mobile routes will be avoided if training occurs in the winter.

Fort Drum PEA Public Review COMMENT/RESPONSE - Tribal Comments

Commenter Number	Comment Number	Organization	First Name	Last Name	Title	Comment	Response
1	1	Oneida Indian Nation	Jesse	Bergevin	Historic Resources Specialist	In Section 2.0, Description of Proposed Action and Alternatives, the Documents discuss the selection of off-post locations. In this discussion, the Documents note that the "selection of sites would be based on consultation and coordination with the appropriate regulatory agencies". The Nation is in possession of information related to the past land use of Oneida ancestors that is above and beyond those resources available to State and Federal agencies.	The PEA has been revised to read "selection of sites would be based on consultation and coordination with the appropriate regulatory agencies and Indian Partner Nations."
1	2	Oneida Indian Nation	Jesse	Bergevin	Historic Resources Specialist	The Nation requests Fort Drum include the Nation in this consultation and coordination with other agencies on this Action to minimize or avoid impacts to historic properties that may be present at off-post locations.	The PEA has been revised to "selection of sites would be based on consultation and coordination with the appropriate regulatory agencies and Indian Partner Nations."

## **PEA Public Review – Newspaper Notices**

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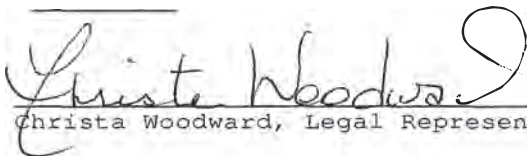
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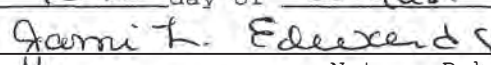
Christa Woodward, of Evans Mills, NY County of Jefferson, being duly sworn, says that she is a Legal Representative of the Johnson Newspaper Corp., a corporation duly organized and existing under the laws of the State of New York, and having its principal place of business in the City of Watertown, New York, and that said corporation is the publisher of the WATERTOWN DAILY TIMES, a Newspaper published in the City of Watertown, Jefferson County, and State of New York, and that a Notice, of which the annexed is a printed copy, has been published regularly in said newspaper.

  
Christa Woodward, Legal Representative

PUBLISHED ON: 07/03 07/07 07/12 07/17 07/19

AD SPACE: 93 LINE  
FILED ON: 07/19/20

Sworn to before me this

10th day of August, 2020  
  
Notary Public

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Page 1 of 1

## US ARMY INSTALLATION FORT DRUM

### FORT DRUM, NEW YORK

#### NOTICE OF AVAILABILITY

**Programmatic Environmental Assessment and Draft Finding of No Significant Impact for Fort Drum 10th Combat Aviation Brigade and 10th Sustainment Brigade Mission and Training Activities**

Fort Drum announces the availability of a Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FNSI) that analyzes and evaluates the potential environmental impacts of increasing mission and training activities at Fort Drum Army Installation and within the Local Flying Area (LFA) of Fort Drum. Environmental consequences were analyzed for two action alternatives; conducting high-intensity, multi-day training events to replicate multi-domain battle either two or up to six times per year, as well as the No Action Alternative.

The PEA and Draft FNSI are available for review at:

<https://home.army.mil/drum/index.php/about/fort-drum-EA>. For those who do not have ready access to a computer or the internet, the materials posted to the website will be made available upon request by contacting Ms. Cait Schadock, NEPA Coordinator, Directorate of Public Works, Fort Drum, by phone at (315) 772-6899, by mail at 4896 Jones Street, Fort Drum, NY 13602-5097, or by email at [usarmy.drum.imcom.mbx.dpw-nepa@mail.mil](mailto:usarmy.drum.imcom.mbx.dpw-nepa@mail.mil). In response to the coronavirus (COVID-19) pandemic in the United States and the Center for Disease Control's recommendations for social distancing and avoiding large public gatherings, Fort Drum will not hold a public information session for this action.

Written comments on the Draft PEA must be received at conclusion of the 30-day public comment period. Public Comments will be received from 6 July 2020 to 5 August 2020. Please submit comments to Ms. Cait Schadock by mail or email at the addresses above.

# The Post-Standard

## LEGAL AFFIDAVIT

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Under Section 206 of the Limited Liability Company Law of New York, County of Onondaga ss.: The undersigned is publisher of The Post-Standard, a daily newspaper published in Syracuse, New York. A notice regarding: was published in said newspaper once in each week for six successive weeks, commencing on 6/25/2019 and ending on 7/9/2020. The text of the notice as published in said newspaper is as set forth below or in the annexed exhibit.

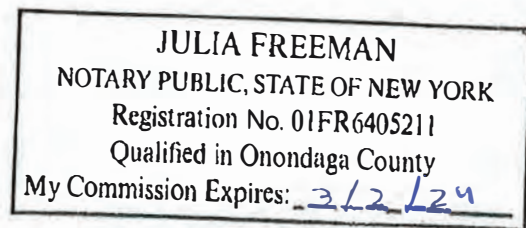
This newspaper has been designated by the Clerk of Onondaga County for this purpose.

Post Standard: 7/9/2020



Lois Rotchford  
Principal Clerk

An Authorized Designee of the President, Timothy R. Kennedy  
Subscribed and sworn to before me on August 13, 2020.

  
NOTARY PUBLIC

FOR QUESTIONS CONCERNING THIS AFFIDAVIT,  
PLEASE CONTACT PAMELA GALLAGHER AT  
(315) 470-2051 OR Legals@Syracuse.com

**US ARMY INSTALLATION FORT DRUM  
FORT DRUM, NEW YORK  
NOTICE OF AVAILABILITY**



**Programmatic Environmental Assessment and Draft Finding of  
No Significant Impact for Fort Drum 10th Combat Aviation  
Brigade and 10th Sustainment Brigade Mission and Training  
Activities**

Fort Drum announces the availability of a Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FNSI) that analyzes and evaluates the potential environmental impacts of increasing mission and training activities at Fort Drum Army Installation and within the Local Flying Area (LFA) of Fort Drum. Environmental consequences were analyzed for two action alternatives; conducting high-intensity, multi-day training events to replicate multi-domain battle either two or up to six times per year, as well as the No Action Alternative.

The PEA and Draft FNSI are available for review at <https://home.army.mil/drum/index.php/about/fort-drum-EA>. For those who do not have ready access to a computer or the internet, the materials posted to the website will be made available upon request by contacting Ms. Cait Schadock, NEPA Coordinator, Directorate of Public Works, Fort Drum, by phone at (315) 772-6899, by mail at 4896 Jones Street, Fort Drum, NY 13602-5097, or by email at [usarmy.drum.imcom.mbx.dpw-nepa@mail.mil](mailto:usarmy.drum.imcom.mbx.dpw-nepa@mail.mil).

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# THE POST-STANDARD

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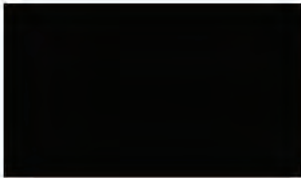
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State of New York, County of Onondaga ss. Pamela Gallagher, of the City of Syracuse, in said County, being duly sworn, doth depose and says: this person is the Principal Clerk in the office of THE POST-STANDARD, a public newspaper, published in the City of Syracuse, Onondaga County, New York and that the notice, is an accurate and true copy of the ad as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following days, viz.:

Post-Standard 07/16/2020

Pamela Gallagher  
Principal Clerk

An Authorized Designee of the President, Timothy R. Kennedy  
Subscribed and sworn to before me, this 16th day of July 2020

  
NOTARY PUBLIC

FOR QUESTIONS CONCERNING THIS AFFIDAVIT,  
PLEASE CONTACT PAMELA GALLAGHER AT  
(315) 470-2051 OR Legals@Syracuse.com

JULIA FREEMAN  
NOTARY PUBLIC, STATE OF NEW YORK  
Registration No. 01FR6405211  
Qualified in Onondaga County  
My Commission Expires: 3/2/24

Date	Position	Description	P.O. Number	Ad Size
07/16/2020	Other Legals NY	US ARMY INSTALLATION FORT DRUM FORT DRUM, NEW YORK		3 x 34.00 CL

**US ARMY INSTALLATION FORT DRUM  
FORT DRUM, NEW YORK  
NOTICE OF AVAILABILITY**

**Programmatic Environmental Assessment and Draft Finding of No  
Significant Impact for Fort Drum 10th Combat Aviation Brigade  
and 10th Sustainment Brigade Mission and Training Activities**

Fort Drum announces the availability of a Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FNSI) that analyzes and evaluates the potential environmental impacts of increasing mission and training activities at Fort Drum Army Installation and within the Local Flying Area (LFA) of Fort Drum. Environmental consequences were analyzed for two action alternatives; conducting high-intensity, multi-day training events to replicate multi-domain battle either two or up to six times per year, as well as the No Action Alternative.

The PEA and Draft FNSI are available for review at <https://home.army.mil/drum/index.php/about/fort-drum-EA>. For those who do not have ready access to a computer or the internet, the materials posted to the website will be made available upon request by contacting Ms. Cait Schadock, NEPA Coordinator, Directorate of Public Works, Fort Drum, by phone at (315) 772-6899, by mail at 4896 Jones Street, Fort Drum, NY 13602-5097, or by email at [usarmy.drum.imcom.mbx.dpw-nepa@mail.mil](mailto:usarmy.drum.imcom.mbx.dpw-nepa@mail.mil). In response to the coronavirus (COVID-19) pandemic in the United States and the Center for Disease Control's recommendations for social distancing and avoiding large public gatherings, Fort Drum will not hold a public information session for this action.

Written comments on the Draft PEA must be received at conclusion of the 30-day public comment period. Public Comments will be received from 6 July 2020 to 5 August 2020. Please submit comments to Ms. Cait Schadock by mail or email at the addresses above.

## **PEA Public Review – Fort Drum Correspondence**

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DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

**JUN 24 2020**

Office of the Garrison Commander

David Stilwell  
US Fish and Wildlife Service  
New York Field Office  
3817 Luker Road  
Cortland, New York 13045

Dear Mr. Stilwell:

Fort Drum is initiating agency coordination for a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.

Attached is the Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FONSI) that analyzes and evaluates the potential environmental impacts of increasing mission and training activities at Fort Drum Army Installation and within the Local Flying Area (LFA) of Fort Drum. Environmental consequences were analyzed for two action alternatives; conducting high-intensity, multi-day training events to replicate multi-domain battle, either two or six times per year, as well as the No Action Alternative.

This PEA describes the application of criteria provided by Fort Drum to select specific sites for the proposed training events. Fort Drum would ensure the appropriate National Environmental Policy Act (NEPA) review is conducted for specific sites when proposed for training events. This PEA was prepared in accordance with NEPA, the Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations (CFR) Parts 1500 – 1508), and 32 CFR Part 651. The site specific NEPA review will be tiered from the PEA and will be consistent with this document, incorporating by reference where appropriate.

Your assistance in providing information is greatly appreciated. Please provide written comments by close of the public comment period to Ms. Cait Schadock, NEPA Coordinator, Directorate of Public Works, 4896 Jones St, Fort Drum, NY 13602-5097, or send via e-mail to [usarmy.drum.imcom.mbx.dpw-nepa@mail.mil](mailto:usarmy.drum.imcom.mbx.dpw-nepa@mail.mil). If nothing is heard by this date, it will be taken as agreement with this action. If you need further information, please contact Ms. Schadock at (315) 771-6026. Public Comments will be received from July 6, 2020 to August 5, 2020.

Sincerely,

A handwritten signature in black ink, appearing to read "J. P. Lucas", written over the printed name.

Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Basil Seggos, Commissioner  
New York State Department  
of Environmental Conservation  
625 Broadway  
Albany, NY 12233

Dear Mr. Seggos:

Fort Drum is initiating agency coordination for a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.

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Your assistance in providing information is greatly appreciated. Please provide written comments by close of the public comment period to Ms. Cait Schadock, National Environmental Policy Act Coordinator, Directorate of Public Works, 4896 Jones St, Fort Drum, NY 13602-5097, or send via e-mail to [usarmy.drum.imcom.mbx.dpw-nepa@mail.mil](mailto:usarmy.drum.imcom.mbx.dpw-nepa@mail.mil). If nothing is heard by this date, it will be taken as agreement with this action. If you need further information, please contact Ms. Schadock at (315) 771-6026. Public comments will be received from July 6, 2020 to August 5, 2020.

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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Robert Stegemann, Regional Director  
New York State Department of  
Environmental Conservation Region #5  
1115 NYS Rt. 86, P.O. Box 296  
Ray Brook, NY 12977-0296

Dear Mr. Stegemann:

Fort Drum is initiating agency coordination for a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.

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Sincerely,

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Jeffrey P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Randall Young, Director  
New York State Department of  
Environmental Conservation Region #6  
317 Washington St.  
Watertown, NY 13601-3787

Dear Mr. Young:


Fort Drum is initiating agency coordination for a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.

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Sincerely,



Jeffrey P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure





DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Matthew Marko, Regional Director  
New York State Department of  
Environmental Conservation Region #7  
615 Erie Blvd. West  
Syracuse, NY 13204-2400

Dear Mr. Marko:

Fort Drum is initiating agency coordination for a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.

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Sincerely,

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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Dr. Nancy Herter  
New York State Historic Preservation Office  
Peebles Island Resource Center  
P.O. Box 189  
Waterford, NY 12188-0189

Dear Dr. Herter:

Fort Drum is initiating agency coordination for a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.

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Sincerely,

A handwritten signature in dark ink, appearing to read "JP Lucas", is positioned above the printed name.

Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Mr. Jesse Bergevin  
Historic Resources Specialist  
The Oneida Indian Nation  
2037 Dream Catcher Plaza  
Oneida, NY 13421-0662

Dear Mr. Bergevin:

We hope that this letter finds you, your family, and the Nation doing well during these challenging times.

Fort Drum has prepared a document that describes a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The nine counties are Jefferson, Lewis, St. Lawrence, Oneida, Oswego, Hamilton, Onondaga, Franklin, and Herkimer. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield. We know that the attached document is a long and imposing one. However, as a valued consultation partner, Fort Drum would greatly appreciate your thoughts, opinions, and any possible concerns related to increased aviation activity in these nine counties.

Attached is the Programmatic Environmental Assessment and Draft Finding of No Significant Impact that analyzes and evaluates the potential environmental impacts of increasing mission and training activities at Fort Drum Army Installation and within the Local Flying Area of Fort Drum. Environmental consequences were analyzed for two action alternatives; conducting high-intensity, multi-day training events per year to replicate multi-domain battle either two or six times per year, as well as the No Action Alternative. The No Action Alternative would be the same amount of aviation training that takes place on Fort Drum today.

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Your time and effort in contributing to this process is greatly appreciated. If you have any questions or concerns at all about this document please do not hesitate to contact Dr. Laurie Rush, my delegated Native American Affairs Coordinator. She can be reached at [laurie.w.rush.civ@mail.mil](mailto:laurie.w.rush.civ@mail.mil) and (315) 783-9894. She will be delighted to hear from you. If you need further information, you could also contact Ms. Cait Schadock at (315) 771-6026. Fort Drum will also be asking for comments from the public and will hope to hear from them between July 6, 2020 and August 5, 2020.

Sincerely,

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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Mr. Tony Gonyea, Faithkeeper  
The Onondaga Nation  
Administration Building  
4040 Route 11  
Onondaga Nation  
Nedrow, NY 13120

Dear Faithkeeper Gonyea:

We hope that this letter finds you, your family, and the Nation doing well during these challenging times.

Fort Drum has prepared a document that describes a new proposed action within the existing nine county Local Flying Area surrounding Fort Drum's Installation Restricted Airspace area. The nine counties are Jefferson, Lewis, St. Lawrence, Oneida, Oswego, Hamilton, Onondaga, Franklin, and Herkimer. The proposed action includes conducting up to six high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield. We know that the attached document is a long and imposing one. However, as a valued consultation partner, Fort Drum would greatly appreciate your thoughts, opinions, and any possible concerns related to increased aviation activity in these nine counties.

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Sincerely,

A handwritten signature in black ink, appearing to read 'JPL', is positioned above the printed name of the signatory.

Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander

Enclosure





DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Office of the Garrison Commander

Mr. Darren Bonaparte  
St. Regis Mohawk Tribe  
Tribal Historic Preservation Office  
71 Margaret Terrance Memorial Way  
Akwesasne, NY 13655

Dear Mr. Bonaparte:

We hope that this letter finds you, your family, and the Nation doing well during these challenging times.


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Sincerely,



~~Jeff Lucas~~  
Colonel, U.S. Army  
Garrison Commander

Enclosure



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

JUN 24 2020

Dear Interested Party,

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The PEA and Draft FONSI are available for review at <https://home.army.mil/drum/index.php/about/fort-drum-EA>. For those who do not have ready access to a computer or the internet, the materials posted to the website will be made available upon request by contacting Ms. Cait Schadock, NEPA Coordinator, Directorate of Public Works, Fort Drum, by phone at (315) 772-6899, by mail at 4896 Jones St, Fort Drum, NY 13602-5097, or by email at [usarmy.drum.imcom.mbx.dpw-nepa@mail.mil](mailto:usarmy.drum.imcom.mbx.dpw-nepa@mail.mil). In response to the coronavirus (COVID-19) pandemic in the United States and the Center for Disease Control's recommendations for social distancing and avoiding large public gatherings, Fort Drum will not hold a public information session for this action.

A public notice has been published in the Watertown Daily Times and the Post Standard announcing the availability of this document for a 30-day public review period beginning July 6, 2020 and ending August 5, 2020.

Fort Drum is calling for written comments from the public on this Programmatic Environmental Assessment. Comments may be provided in writing at any time during the public comment period and must be received/postmarked no later than August 5, 2020. Please submit comments to Ms. Cait Schadock by mail or email at the addresses above.

We greatly appreciate your participation.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffery P. Lucas", is positioned above the printed name.

Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander

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## **PEA Public Review - Agenc, Indian Partner Nations, and Public Responses**

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-----Original Message-----

From: Niver, Robyn [mailto:robyn\_niver@fws.gov]

Sent: Monday, August 3, 2020 7:53 AM

To: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA) <cathryn.e.schadock.civ@mail.mil>

Cc: USARMY Ft Drum IMCOM Mailbox DPW NEPA <usarmy.drum.imcom.mbx.dpw-nepa@mail.mil>;

Wagner, Jason E CIV USARMY USAG (USA) <jason.e.wagner.civ@mail.mil>; Miller, James M CIV (USA)

<james.m.miller352.civ@mail.mil>; Dobony, Christopher A CIV USARMY ID-READINESS (USA)

<christopher.a.dobony.civ@mail.mil>; MacDuff, Andrew (DEC) <andrew.macduff@dec.ny.gov>

Subject: [Non-DoD Source] Re: [EXTERNAL] Fort Drum Programmatic Environmental Assessment (PEA) for Mission and Training Activities

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

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Good morning,

Thank you for providing the opportunity to review the draft PEA. I have just a few comments/questions for your consideration.

Page 13, Section 2.2 - It would be helpful to include a better description of the general types of activities that are anticipated to occur on the ground. For example, are smoke operations part of ground support activities? Given the limited description it is difficult to provide comments regarding most of the subsequent analyses. I understand that this is programmatic in nature and perhaps those additional details are going to be provided in the tiered NEPA documents but if they are generally known now, it would be helpful to include.

Page 28, Section 3.1.2 - What is the definition of "protected lands"? If training is not occurring on parks or protected lands but is occurring on public lands - what kind of public lands does this mean? Aren't public lands protected to some degree? This is just a confusing section.

Page 48, Table 3-8 - It is unclear where the information came from to populate this table. For example, there are known hibernacula for Indiana bats and northern long-eared bats (NLEB) in the action area. Also, there are no flocks of piping plovers along Lake Ontario but we have had 1-2 nesting pairs with chicks in the last several years and sometimes another 1-2 birds during migration events. The word "small" should be removed when describing bog turtle populations in Oswego County.

Page 51, Table 3-9 - The first example conservation measure for the NLEB doesn't avoid impacts but seems to comply with the 4(d) rule. The smoke and obscurants bullet raises questions about whether smoke should be analyzed throughout the document for health, etc. The statement that the NLEB bullets apply for the Indiana bat is not correct as the first NLEB bullet is designed to ensure compliance with the NLEB 4(d) rule and would not avoid impacts to Indiana bats. The two piping plover bullets cannot be used together - one suggests full avoidance and the other suggest some impacts but just not during the nesting season. Given that there are few bog turtle and Eastern massasauga (EMR) locations, it seems like they can be completely avoided and that is the only bullet needed for these 2 species (similar to American hart's-tongue fern). Avoiding training during the active season is not sufficient for bog turtles and EMR and those example measures should be deleted.

Thank you again.

Robyn

\*\*\*\*\*

Robyn A. Niver  
Endangered Species Biologist

New York Field Office  
3817 Luker Road  
Cortland, NY 13045  
607-299-0620

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From: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA) <cathryn.e.schadock.civ@mail.mil>  
Sent: Friday, June 26, 2020 9:52 AM  
To: Niver, Robyn <robyn\_niver@fws.gov>  
Cc: USARMY Ft Drum IMCOM Mailbox DPW NEPA <usarmy.drum.imcom.mbx.dpw-nepa@mail.mil>; Wagner, Jason E CIV USARMY USAG (USA) <jason.e.wagner.civ@mail.mil>; Miller, James M CIV (USA) <james.m.miller352.civ@mail.mil>; Dobony, Christopher A CIV USARMY ID-READINESS (USA) <christopher.a.dobony.civ@mail.mil>  
Subject: [EXTERNAL] Fort Drum Programmatic Environmental Assessment (PEA) for Mission and Training Activities

Dear Ms. Niver,

Fort Drum is initiating agency coordination for a new proposed action within the existing nine (9) county Local Flying Area (LFA) surrounding Fort Drum's Installation Restricted Airspace area. The proposed action includes conducting up to six (6) high-intensity, multi-day training events per year at off-installation locations to replicate multi-domain battle. These training events would serve to integrate air and/or ground operations, and sustainment activities by simulating real-world distances and threats, challenging logistical supply lines and mission command systems over distances beyond the geographic boundaries of Fort Drum, as well as expanding logistical routes via air and ground to simulate a large-scale battlefield.

Attached is a digital copy of the Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impact (FONSI) that analyzes and evaluates the potential environmental impacts of increasing mission and training activities at Fort Drum Army Installation and within the Local Flying Area (LFA) of Fort Drum. Environmental consequences were analyzed for two action alternatives; conducting high-intensity, multi-day training events per year to replicate multi-domain battle either two or six times per year, as well as the No Action Alternative.

Your participation is greatly appreciated. Please provide written comments by close of the public comment period to Ms. Cait Schadock, NEPA Coordinator, Directorate of Public Works, 4896 Jones St,



Fort Drum, NY 13602-5097, or send via e-mail to [usarmy.drum.imcom.mbx.dpw-nepa@mail.mil](mailto:usarmy.drum.imcom.mbx.dpw-nepa@mail.mil). Hard copy of the document will be mailed to your office. If you need further information, please contact Ms. Schadock at (315) 771-6026. Public Comments will be received from July 6, 2020 to August 5, 2020.

Sincerely,  
Cait

Ms. Cait Schadock  
NEPA Coordinator, Directorate of Public Works Fort Drum, New York 13602  
Office: (315) 772-5110 DSN: 772; Mobile: (315) 771-6026 I am teleworking. Please Call Mobile #, Leave message if voice mail answers.

Fort Drum - "We are the Army's Home"  
"Serving the Rugged Professional"

CLASSIFICATION: UNCLASSIFIED

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**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

July 2, 2020

Laurie Rush  
Cultural Resources Manager  
US Army, Fort Drum  
4896 Nininger Road  
Fort Drum, NY 13602

Re: ARMY  
Preliminary Aviation Environmental Assessment/Fort Drum  
20PR03858  
Project 2020.15

Dear Ms. Rush:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the Programmatic Environmental Assessment, dated June 2020, and the Draft Finding of No Significant Impact accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

Based upon this review it is the opinion of the SHPO that no historic properties, including archaeological and/or historic resources, will be significantly impacted by this undertaking with the implementation of the *Best Management Practices and Compliance Measures for Alternatives 1 and 2*, noted on pages 64-65.

If you have any questions, I can be reached at [nancy.herter@parks.ny.gov](mailto:nancy.herter@parks.ny.gov).

Sincerely,

A handwritten signature in black ink that reads "Nancy Herter".

Nancy Herter  
Archaeology Unit Program Coordinator

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# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## Region 6 Main Office

Dulles State Office Building, 317 Washington Street, Watertown, NY 13601-3787

P: (315) 785-2239 | F: (315) 785-2242

[www.dec.ny.gov](http://www.dec.ny.gov)

August 5, 2020

Ms. Cait Schadock  
NEPA Coordinator  
Directorate of Public Works  
4896 Jones Street  
Fort Drum NY 13602-5097

RE: NYSDEC Comments on Programmatic Environmental Assessment for 10<sup>th</sup>  
Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training  
Activities, Fort Drum, New York

Dear Ms. Schadock:

I have enclosed comments from the New York State Department of Environmental Conservation ("DEC") regarding the PEA and draft FNSI. The DEC appreciates the opportunity to comment and strongly supports the need to provide the best training opportunities possible for our soldiers stationed at Fort Drum. We are committed to working with Fort Drum to help in achieving this goal, and believe that the enclosed comments will assist in that effort.

We appreciate the close working relationship among Fort Drum, the DEC, and members of the public on these issues in the past, as evidenced by the Northern New York Military Airspace Committee which helped to facilitate broad support for Fort Drum operations over New York State's public and private lands. While we appreciate the current process for completion of environmental review, we encourage a renewal of the history of direct discussion and engagement. Discussing the needs of the Army and how they apply to the characteristics, legal protections, and public concern for lands under DEC jurisdiction with both DEC and members of the public will increase the likelihood of quickly identifying appropriate and broadly supported sites.

Many of our comments stem from uncertainty about scope and location of the operations and flights to be conducted. Such information will allow us to better understand potential impacts to specific classifications of state land, in particular Forest Preserve lands. We would welcome the opportunity to engage in additional discussion so that we can be better prepared to provide these assessments and to work with you towards planning for this important work.

Thank you again for the opportunity to comment. We look forward to working with you.  
Please feel free to contact me at 315-785-2239.

Sincerely,



Randall C. Young  
Regional Director  
NYSDEC Region 6

Enclosure

ec: J. Drabicki  
R. Davies  
M. Marko  
K. Petronis  
K. Richards  
S. Sheeley  
D. Whitehead  
T. Wilkinson  
J. Zalewski



## **NYSDEC Comments regarding Programmatic Environmental Assessment for Fort Drum 10<sup>th</sup> Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities Fort Drum New York (“PEA”)**

NYSDEC appreciates the opportunity to comment on the Programmatic Environmental Assessment for the Fort Drum 10<sup>th</sup> Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities Fort Drum New York. We fully support the efforts of the Army to train our soldiers as thoroughly and effectively as possible. When requested, we look forward to continuing to cooperate with the Army's efforts to provide this training for our soldiers.

### **Summary of the Proposal**

This PEA concerns a proposal for off base military exercises in nine counties in northern New York involving the following units of the United States Army 10<sup>th</sup> Mountain Division:

- 10<sup>th</sup> Combat Aviation Brigade or the 10<sup>th</sup> CAB - This is an Army aviation unit composed of several types of helicopters including Apaches, Black Hawks, Chinooks, and MEDVACS.
- 10<sup>th</sup> Sustainment Brigade or the 10<sup>th</sup> SBDE - This unit provides combat service and combat support; supply, maintenance, medical, and transportation operations to combat units while also being able to fight alongside combat units.

The area where the exercises are proposed for include St. Lawrence, Jefferson, Lewis, Herkimer, Oneida, Essex, Hamilton, Onondaga, and Oswego counties.

The Army intends to provide training for mission specific purposes to help prepare the soldiers of these units for deployment combat situations. The aviation unit needs to prepare for low elevation flight conditions to avoid radar and ground threats in combat situations at the same time. The PEA states the terrain and rural character of the area provide for effective training while having a low impact on the communities and natural resources.

Two alternatives, besides the “No Action” alternative, are proposed; Alternative 1 proposes up to 6 exercises annually of up to 14 days each, and Alternative 2 proposes up to 2 exercises annually. Both alternatives provide for up to 7 additional days for cleanup

During an exercise one or more temporary “sustainment sites” (encampments) would be established on private or public lands, with permission, of course.

- The site would need to be an open, grassy area/field, well drained, that would need minimum preparation for use, and that could be returned to its previous use once the exercise is complete;
- Have road access;
- 5 acres in size for a small event, 10 or more acres for a large event;

- An agreement with a private/commercial owner would need to be established, or a TRP for use of State lands or conservation easements.

Helicopters would be flying in the already established Local Flying Areas (LFAs) and would be following the regular guidelines of avoiding residences, livestock, and generally flying higher than 300 to 500 feet. This proposal does not include any changes to the existing flight rules, routes, or areas, but it appears the activity may result in higher frequency of low-level flights over rural areas off-based including Forest Preserve. Figure 1-4 identifies Military Training Routes, but at page 9 the CAB states that the CAB does not normally use MTRs.

### **General Comments**

- The document should reference specifically stated definitions for the categories of public lands mentioned -- such as Wildlife Management Areas, State owned Forest Preserve (classified as Wild Forest, Wilderness, etc.) and State Forests -- rather than reference them as "protected lands, parks and recreation areas." The terms for different categories of lands should be used consistently throughout the document.
- The PEA references Forest Preserve in descriptions of lands use types but makes no reference to unique characteristics or legal protections given Forest Preserve Lands under state law. No avoidance or mitigation measures for potential adverse effects to Forest Preserve are discussed.
- The discussion of noise impacts in §3.2.1 states that people's level of irritation due to noise depends upon the setting and their expectations. Wilderness Areas are designated in part for their remote nature and absence of the intrusion of man. With strict exceptions, motorized equipment and vehicles are excluded from Wilderness to preserve the wilderness experience. Therefore, the use of the day-night weighted average to gauge level of intrusiveness is not valid for these areas. People enter Wilderness with an expectation, and often, the purpose of avoiding exposure to noise from mechanized sources. See *Minnesota v. Black*, 660 F. 2d 1740 (8<sup>th</sup> Cir 1981) cert denied.
- The "Avoidance Areas" map does not depict the areas from prior Environment reviews for use of air space over the region designating areas to avoid, particularly for low-level flights over Forest Preserve. These were previously agreed upon between the United States, New York State, and other stakeholders and incorporated into environmental reviews for military flights. See, for example, *Final Environmental Assessment for Proposed to the New York National Guard Adirondack Range Air Space Modifications*, section 3.5.1 and Figures 3.5-1a through 3.5-2e.
- If low-level flights are expected to take place at elevations and in locations that vary from previously assessed activities, an Environmental Impact Statement should be prepared to assess the potential for significant environmental effects of this proposal.
- With respect to the Military Training Routes (MTR) flight paths, they are not imposed upon a map layer that depicts public lands, including the land areas we previously identified as noted above.



- The PEA states that use of public lands will be preferable (versus private) while at the same time they state they will “avoid protected lands, parks and recreation areas, if possible.” The PEA does not define the terms “protected lands, parks, and recreation areas.” Forest Preserve, Wildlife Management Areas, and Reforestation Areas are “protected lands” and “recreation areas,” and comprise the majority of public land within the affected area.
- The PEA does not state criteria for determining whether avoidance of protected lands, parks, and recreation areas will be “possible.”
- The PEA should address measures to be taken to avoid or mitigate impacts to Wild, Scenic and Recreational Rivers as defined by Article 15 title 27 of the New York state Environmental Conservation Law.
- The PEA does not address the potential for impacts to air quality that could result from operations of vehicles and other mechanized equipment in the areas where operations will occur.
- Mitigation of previous proposals for military flights in the area in question included prior notice to the public along flight routes and a telephone number the public could call to provide comments or complaints. These should be considered for both the land and air portion of these exercises.

We understand that any further implementation of the alternatives as outlined in the PEA will be site specific in accordance with existing state law and in consultation with DEC (as a regulator and landowner). It would be best if the PEA could recognize that the large protected areas implicated by the alternatives will have an impact on eventual training operations.

### **Public Review Process**

Prior reviews of low-level military flights developed significant public interest, resulting in the establishment of a working group to provide information to the public and address public concerns. Non-governmental stakeholders from that working group should be provided notice of the proposal with a copy of the PEA and additional time to comment.

A previous proposal for use of a state reforestation area for military exercises similarly generated significant public interest. Inclusion of a public participation process to provide information to the public and receive public comments regarding use of public lands is strongly recommended. DEC can provide assistance with public participation regarding use of state lands under DEC jurisdiction.

### **Forest Preserve, Reforestation Areas, and Conservation Easement Lands**

The PEA mentions state forests and conservation easements as possible locations for encampments. The PEA provides an excellent explanation of the criteria needed for potential training areas. We recognize that identifying specific sites will be part of a future process and will cooperate as needed in that process.

A previous proposal for large-scale military use of state lands generated significant public interest and concerns. DEC suggests inclusion of a process for public engagement to provide information regarding exercises and solicit comments.

Please be aware that lands under DEC jurisdiction will have few areas that meet the criteria identified. Section 3.1.1.2 “Land Use in the Nine-County Area” describes the land use in each of the counties. The last paragraph of this section titled, “Regional Land Use Summary” states: “Adirondack Park located approximately five miles east of the Fort Drum boundary contains six million acres of federally protected forests on public and private lands.”

Though it is possible that statement relates to the National Historic Register designation of the Adirondack Forest Preserve, that does not include the private land within the Park.

The Adirondack Park was created under authority of New York State Law and the Forest Preserve is protected pursuant to Article 14 of the New York State Constitution. Further, pursuant to New York State Executive Law, the Adirondack Forest Preserve State Land Master Plan classifies and governs the uses of Forest Preserve Lands based upon their character and ability to withstand use.

#### Page Specific Comments

**Page FNSI-iii** - In Table FNSI-1, under Land Ownership, it should reference Temporary Revocable Permits (TRPs) for state lands.

**Page ES-iv** - In the first paragraph on this page it says, “Fort Drum’s intent is to prioritize use of public lands.” Most of our state forest, conservation easement, forest preserve, and wildlife management areas would not have the 5 to 10 acres or more of open fields that the PEA states are needed for the encampments that are part of the exercises proposed.

**Page 13** - The last paragraph on this page has the same statement as Page ES-iv above about prioritizing public lands.

**Page 14** - Table 2-1 is the same table as Table FNSI-1, so it should also mention TRPs.

**Page 24** - Jefferson County paragraph - The third sentence says, “Jefferson County contains acres of state and county forests and wildlife management areas and parks.” There are thousands of acres of state forest, wildlife management areas, and state parks, and county forest and local parks.

**Page 25** - Herkimer County paragraph - The upper part of Herkimer County is within the Adirondack Park. Much of the land in this part of the county is Forest Preserve lands including campgrounds and wilderness areas. Outside the portion within the Adirondack Park there are state forests north and south of the Mohawk River and a significant amount of agricultural lands.

**Page 25 -** St. Lawrence County paragraph - The first paragraph references the southeastern third of St. Lawrence County as having paper and wood product industries. There are a limited number of papermills and sawmills and other wood product producers in this area, other than landowners that manage their lands for timber production. Most of them are smaller private landowners while the larger ones are commercial timber investment entities, rather than industry wood product companies.

Easement lands referenced within the Adirondack Park are privately owned land that NYS has acquired a conservation easement on. These easements usually include some public recreation rights though not on all easements. The state also acquires most of the development rights as part of the Conservation Easement to limit the amount of development that can occur on the ownership.

**Page 25 -** Hamilton County paragraph - Unlike the preceding paragraphs for Herkimer and St. Lawrence County, this paragraph fails to state the existence of Forest Preserve within the county. The second sentence states: "Because Hamilton County is located in the Adirondack Park, any development in the county is limited by the NYS Constitution, which protects the park land." This is not entirely accurate. The Forest Preserve land owned by the state within the Adirondack Park is protected from development by the NYS Constitution. Forest Preserve is a significant component of the land within the county, but private land development activities are regulated pursuant to the NYS Executive Law as well as local land use laws.

**Page 25 -** The paragraphs pertaining to Essex, Lewis, and Oneida counties fail to note the presence of Forest Preserve within those counties.

**Page 25 -** The paragraph regarding Lewis County states: "Over 50 percent of the land in Lewis County is designated as Wild/Forest..." Is this a description of cover-type, or official classifications of publicly owned land by the governmental entity with jurisdiction over the lands in question?

**Page 25-6 -** Regional Land Use Summary - One sentence says, "Adirondack Park located approximately five miles east of the Fort Drum boundary contains six million acres of federally protected forests on public and private lands." There is no federal protection of lands within the Adirondack Park. The Forest Preserve (the State-owned) portion of the Park is listed in the National Register of Historic Preservation.

The final sentence of this paragraph says, "Land use policies in the surrounding counties are under the jurisdiction of those counties and dictate how land would be used in the counties." While that may be accurate for private lands (though I believe municipalities and towns have more direct control than counties), it is not accurate for State lands within these counties.

**Page 34-5** 3.2.2.3 Alternative 1 - This section assesses the effect of noise on humans, wildlife, and domestic animals as a result of the proposed exercises.

**Page 34 -** Noise Effects on Humans - This notes that, "Helicopter operations at Wheeler-Sack Army Airfield would not increase due to Alternative 1 since training exercises are already being performed at Fort Drum and the surrounding nine counties."

It then references a study from 2016, “Fort Drum Installation Compatible Use Zone Study” that would not need to change since the level of helicopter use would not increase.

Regarding off-base flights, no routes for helicopter flights are identified. The potential for adverse noise impacts to Forest Preserve and Wilderness areas as defined in the Adirondack Park State Land Master Plan are not addressed. Figures 3-5 and 3-6 do not exclude the possibility of repeated low-level flights over Forest Preserve generally or Wilderness areas specifically. Significant areas of Forest Preserve, including Wilderness Areas, are affected by noise from military training flights that were subject to previous reviews that included extensive consultation with the United States, New York State, and other stakeholders to address stakeholder concerns. These included mitigation measures, including maintaining flights at specific elevations above ground level over Wilderness areas. See, for example, *Final Environmental Assessment for Proposed to the New York National Guard Adirondack Range Air Space Modifications*, section 3.5.1 and Figures 3.5-1a through 3.5-2e, table 3-5.1 and Chapter 7. Figure 3-6 depicting “Airspace Designations and Noise Sensitive Areas” also does not reflect the sensitive nature of the Adirondack Park (and other public lands within the Action Area). The general descriptions of the exercises and lack of information regarding particular locations and flight routes make it difficult to determine the significance of potential adverse environmental effects of the increased training.

The location of encampments will have concentrated impacts of noise, in particular, on adjacent areas. For example, if the Moore Airfield in St. Lawrence County, which is inside the Adirondack Park, is used as a regular location of six exercises a year, the potential exists for a significant increase in impacts of helicopter noise and visibility on Forest Preserve lands in the area. If low-level flights are expected to take place at elevations and in locations that vary from previously assessed activities, issuance of a FNSI (Finding of No Significant Impact) would not be appropriate given the potential impacts.

#### **Use of Wildlife Management Areas (WMAs):**

As previously stated, we understand that specific sites for training events will be identified in the future and NYSDEC will work to the best of our ability to help with this as needed. The comments below are intended to provide information to assist with that effort from its outset.

The Attributes for Consideration listed in Table FNSI-1 provide a thorough framework for evaluating potentially suitable sites for events. After reviewing the *Attributes for Consideration*, we believe that WMAs would generally be poorly suited for these proposed operations. While many WMAs have field areas within the listed size parameters of the PEA, many are also home to both breeding *and* overwintering threatened and endangered species where we have invested significant federal funds for habitat creation, improvement, and management. Another attribute is to avoid known occurrence locations of threatened and endangered species. As previously noted, many of our WMAs are habitat for threatened and endangered species.

Table FNSI-2 notes that if public lands are used, the Army will avoid peak use times by groups such as hunters, anglers, and boaters. WMAs exist for many reasons including to provide wildlife-dependent recreation such as hunting and trapping (see *Public Use of Wildlife Management Areas* at [http://www.dec.ny.gov/docs/wildlife\\_pdf/publicuseofwmas.pdf](http://www.dec.ny.gov/docs/wildlife_pdf/publicuseofwmas.pdf) ). The affected region is home to a diversity of game species and as such, has hunting and trapping seasons spanning from September through May of each year. The remaining months of the year are peak breeding and young-rearing periods for most wildlife species.

Considering just these criteria, most WMAs in the region would not be compatible with the type or level of use proposed. Further review and analysis of specific WMA properties could be conducted once the details of the operations are known. Factors such as timing, number of personnel, number of vehicles, number of aircraft, and frequency of use would be key to determining potential impacts to wildlife and their habitats.

Public use of these properties occurs year-round to some degree; however, the most significant occurs near populated areas, particularly Onondaga County and the western and south eastern portions of Oswego County. In these areas, use of these properties for military training would likely cause concern with members of the public as this is not an activity that they would be accustomed to.

#### **Use of private property:**

The same concerns expressed about use of WMAs could also apply to use of private lands as well, dependent on location. Figure 3-10 of the PEA demonstrates how challenging it will be to locate a site in Region 6 where suitable site conditions can be found and threatened and endangered species do not exist. As with WMAs, we would be happy to conduct further analysis and review of specific private properties once the additional details listed above are known.

#### **Impacts to wildlife:**

As the PEA notes, there is significant potential for negative impacts to many wildlife species as a result of these proposed operations. The severity and duration of these impacts are dependent on operation specifics such as area of interest, timing, duration, number of personnel, frequency of use, and the type and number of vehicles and/or aircraft used. Potential impacts could include incidental take of species or nests via motor vehicle strike, aircraft strike, rotor wash, or trampling by ground personnel. Taking could also occur via habitat loss and temporary or permanent displacement of species. A more definitive determination of potential impacts to wildlife can be provided once specific properties for proposed operations are identified.



## Potential Permitting Requirements

The proposed activities within the action area may require state Uniform Permit Act actions. The proposal included several avoidance measures to limit the necessity of obtaining those permits. However, incorporation of this framework would aid future site selection processes.

For areas outside the Adirondack Park, a state freshwater wetlands permit under 6 NYCRR Part 663 would be required if the proposed activities occur within 100' of a wetland delineated using state protocols. The PEA stated a 200' buffer would be incorporated into the site selection process obviating the need for state wetland permitting.

Similarly, any disturbance to the bed or banks of protected water courses; or fill/excavation in a navigable waterbody would require 6 NYCRR Part 608 Protection of Waters permits. Although the action proposes to use upland sites and avoid watercourses, we recognize there may be a need to provide access roads across headwater streams.

The Clean Water Act Section 401 Water Quality Certification would be necessary if a determination was made that a federal Section 404 action was required.

Several state-designated Wild, Scenic and Recreational Rivers exist within the action area. The state regulation would require a permit under 6 NYCRR Part 666 if the off-base ground exercise areas are located within 1/2 mile of the designated river segment.

The proposed action included a listing of the training activities; among these were hand-digging small grey water soakage pits for food service washing and water purification. These activities may require a State Pollution Discharge Elimination System (SPDES) permit under 6 NYCRR Part 750. We have permitted specific locations for use of Tactical Water Purification Systems (TWPS) for training activities on-post for their backwash wastewater. Additional information will be necessary for jurisdictional evaluation of the use of seepage pits.

Coverage under the state SPDES General Permit for Stormwater Discharges Associated with Construction Activities is necessary if the proposed disturbance at the off-post ground training exercise areas is greater than one acre. As noted, the development of the Stormwater Pollution Prevention Plan is a requirement of that permit.

NYS regulations provide for a permitting system for the take of any threatened or endangered species or their occupied habitat under 6 NYCRR part 182. A permit may still be required even if avoidance and minimization measures are incorporated into the site selection process. The greatest potential for this would be for grassland bird species based on the general site selection criteria.

## CONCLUSION

NYSDEC appreciates the thoughtful analysis of potential environmental effects of the action proposed. We expect that examination of specific potential impacts or greater elaboration of the considerations evaluated will allow for complete understanding of all the potential impacts. DEC requests that this additional information be discussed and provided so that it can properly evaluate the plan and determine whether the plan as developed will trigger the need for an EIS (instead of issuing a FNSI). NYSDEC welcomes the opportunity to engage in further discussions to achieve the training goals described in the PEA while ensuring any potential adverse environmental effects are avoided or mitigated. Discussions between DEC and representatives of the Army in the past have been highly productive in addressing potential issues related to potential impacts of military exercises to the environment and state lands.

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## Adirondack Park Agency

ANDREW M. CUOMO  
Governor

TERRY MARTINO  
Executive Director

August 5, 2020

Ms. Cait Schadock,  
National Environmental Policy Act Coordinator  
Directorate of Public Works  
4896 Jones St,  
Fort Drum, NY 13602-5097

Re: Comments pertaining to the Programmatic Environmental Assessment for the proposed Fort Drum 10<sup>th</sup> Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities, June 2020.

Dear Ms. Schadock:

Adirondack Park Agency (Agency or APA) staff wish to thank you for the opportunity to comment on the proposed Programmatic Environmental Assessment (PEA) pertaining to the Fort Drum 10<sup>th</sup> Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities, dated June 2020. The APA recognizes and supports the U.S. Army's critical mission to provide effective training. Staff appreciates that the Army has taken the necessary first steps in evaluating the potential impacts associated with the proposed training activities. The scope and detail of the analysis at the programmatic level however does not appear to be sufficient to support a finding of no significant impact given the complexity and sensitivity of the Action Area and the Adirondack Park in particular. The proposed tiered assessment process appears to segment decision making inappropriately and Agency staff urges the Army to prepare an Environmental Impact Statement (EIS). Agency staff has a long history of working effectively with the NYANG in the process of modifying the MTRs and MOAs in the Adirondack Airspace and we recommend that a similar stakeholder process be employed here given the significance of the proposed action.

### **General**

The Agency may have jurisdiction over some of the activity identified in the PEA and should therefore be consulted in the environmental review process. Similar to the other State agencies and municipalities listed in Appendix A-1 outlining the Fort Drum PEA

Coordination and Consultation Mailing, the APA should be cited and consulted during the course of your planning and environmental review.

The proposed Nine County Action Area includes portions of four counties and the entirety of two counties within the Adirondack Park (Park). The Agency administers three laws including the APA Act, NYS Wetlands Act (inside the Park), and the Wild, Scenic and Recreational Rivers Act on private lands within the Adirondack Park. The Agency administers the State Wetland Act within the Park and should be consulted regarding any activity that may involve regulated wetlands. The APA is also responsible to review jurisdictional new land use and development on both public and private lands within the Park. Finally, the Agency has the responsibility to administer the Adirondack Park State Land Master Plan (APSLMP) that both classifies State lands and provides guidelines and criteria for their management in consultation with the DEC, see below.

The Agency has had a long history of working with the NYANG on the past modifications to the MOAs and MTRs over the Park. The process was productive and open in working through the issues related to the management of the Adirondack Park, a park of local, national and international significance. Agency staff recommend that this process of a wider involvement of stakeholder groups through an EIS process will result in a better understanding of the importance of the training activities as well as the impacts that may be planned for and mitigated across the proposed Action Area.

### **Tiered Environmental Review and EIS**

Agency staff believes that the information provided in the PEA is insufficient and that greater detail is required to understand the proposal and to accurately evaluate the potential resource impacts associated with it. The proposal poses a greater significance of environmental impact than identified and a FONSI does not appear appropriate at this time. Agency staff believes that a full EIS is warranted and that greater opportunity for public involvement should be provided. Given that the use of public lands has been identified as a priority and that there is a strong public interest in the management of State lands in the Park, broader stakeholder involvement is considered appropriate. Scoping and a more detailed description of the proposed action as part of a full EIS will also help to support the necessary findings to be made for an eventual training program. The use of a tiered analysis as part of an initial environmental assessment appears to segment the decision making inappropriately and staff do not believe it should be employed here.

### **Timing and Duration of Training Activity**

Agency staff believe more detail is needed to support the determination that potential duration of training activity on public land can be considered minor and short term. The PEA identifies in Alternative 1 up to 6 events per year lasting a total of 21 days each and totaling potentially 126 days per year. The PEA also indicates that it intends to prioritize the use of public lands and to avoid impacts to wildlife and recreational uses by avoiding key sensitive wildlife periods like migration and nesting and peak recreational periods such as fishing, hunting and boating. A program of repeated training of this nature, year after year with coordinated air and motor vehicle support and with the temporary development of encampments ranging in size between 5 and 10 acres has the potential to create longer term impacts to overall management of State lands in the Park. Agency staff believe more detail is required in assessing the cumulative impact of the training program of this type over a longer time period than a year. Staff also believes that the potential increases in levels of aircraft activity associated with this new proposal in the LFA, MOAs and MTRs should be more clearly described and assessed. Finally, the environmental analysis should describe in greater detail how the mitigation strategy of avoiding impacts to wildlife and various recreational uses, including wintertime uses, will fit with a schedule of potentially 126 days in a given year.

### **Potential impacts on State lands**

The programmatic assessment does not identify the two-tiered structure established by the legislature for the management of State lands in the Adirondack Park or for the APA's responsibility for the long-term planning and policy for the State lands, in consultation with the DEC. The Adirondack Park State Land Master Plan (APSLMP) administered by the Agency establishes the classification of the State lands and provides guidelines and criteria for their management.

The two largest categories of land classification in the Park are the areas managed as Wilderness (approximately 1.2 million acres) and Wild Forest (approximately 1.3 million acres). In general, the Wilderness definition in the APSLMP is identical to the Federal Wilderness definition and the State's management of these areas is very similar. The areas are managed to achieve and perpetuate a natural plant and animal community and they possess outstanding opportunities for solitude, and primitive and unconfined types of recreation. The public use of motor vehicles is not permitted and administrative use of motorized equipment and aircraft may only occur on a very limited basis.

Designated Wild Forest areas permit a somewhat higher degree of human use than in wilderness while retaining an essentially wild character. These areas frequently lack the

sense of remoteness of wilderness areas and they permit a wide variety of outdoor recreation including limited public motor vehicle use. Many of the larger Wild Forest areas have interior portions that do maintain a sense of remoteness and provide for unconfined primitive recreation similar to the Wilderness areas.

All State lands in the Park are protected and managed for the sensitive biological and ecological resources they contain. As a general principle of the APSLMP, the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded. This principle is a very high standard and should be considered when evaluating alternatives across the entire Action Area, when considering mitigation strategies and when making determinations of significance of an impact.

Agency staff recommend that the PEA be more specific about the various designations of State lands in the Park and clearly identify the sensitive resources and uses that should be avoided within these areas, in consultation with both the DEC and APA. This can serve as a first step in evaluating whether the use of these areas is appropriate when weighed against the alternatives across the entire proposed Action Area. Without greater detail at the programmatic assessment level, it is difficult to evaluate how the Forest Preserve lands inside the Blueline are to both be prioritized for use and avoided, and to determine by what criteria the use, if any, of public lands is to be undertaken. Reviewing this as part of a more detailed EIS is recommended due to the complexity of the resource protection concerns and the strong public interest in the management of State lands.

### **Cultural Resources**

The PEA states that “most of the registered historic places are located in cities and villages.” The programmatic assessment does not mention or consider the nearly 2.6 million acres of designated Forest Preserve listed on the National Register of Historic Places as the Adirondack Forest Preserve National Historic Landmark, listed on October 15, 1966, Reference No. 6600891. The Cultural Resources section of the PEA states that historic resources will be avoided. Without greater detail at the programmatic assessment level, it is difficult to evaluate how the Forest Preserve lands inside the Park are to both be prioritized for use and avoided and, to determine by what criteria the use, if any of public lands is to be undertaken.

### **Potential Noise Impacts**

The potential impact due to noise is a significant consideration in the Adirondack Park both for the public lands and for the residents and visitors to the Park in the Hamlet areas and private camps along the shorelines of the Park. The proposed ground training activities with coordinated air support is a distinctly different type of impact that will be added to the existing impacts related to the F-16 and F-35 training in the established MTRs and MOAs.

The fixed-wing training that has occurred in the established MTRs and MOAs this year have resulted in a number of camp owners, environmental advocacy groups, recreationists and residents calling the Agency expressing concerns about the perceived increase in training activity. Agency staff directed the callers to contact the NYANG's 800 phone number to ask questions or to lodge a complaint if they desired. Though anecdotal, Agency staff have not received this number of inquiries in recent memory. This is mentioned to recognize that there may already exist a significant level of concern with the existing noise associated with the established Airspace usage over the Park. Adding additional activity may result in the cumulative impact of the Fixed-wing and the activities associated with the new proposal reaching a level of annoyance.

Agency staff believe the addition of new noise sources for the duration of the coordinated exercises as described in the PEA may cause more sustained and greater noise impacts beyond the startle effects, temporary displacement and habituation as identified in the draft PEA. Staff note that the assessment methodology employed is dated 1974 and the literature citations used for supporting the conclusions made about potential wildlife impacts are greater than 20 years old. In particular, the noise analysis appears to use an established background, ambient noise level of approximately 60 dBA which may be appropriate for a suburban setting. When considering potential impacts to wildland settings it appears it is more relevant to consider a lower ambient level between 20 dBA to 30 dBA. Extensive and more recent research is now available and methods of analysis as employed by the National Park Services Soundscape Program are examples of the level of detail that should be used in assessing the potential impacts of noise to wildlife and recreationists seeking an opportunity for solitude in the Wilderness and Wild Forest areas of the Adirondacks.

The environmental impact analysis should be more specific when identifying sensitive resources, evaluating alternatives and when discussing mitigation strategies such as temporal avoidance and physical buffering. This analysis should be focused on both an ecological and human experience perspective, particularly in relation to the designated Wilderness and Wild Forest areas.

### **Cumulative Impacts**

The PEA considers the two training exercises that occur within the proposed Action Area including (1) Jaded Thunder – Per Fort Drum, Special Operations exercise that only occurs when the CAB is deployed and includes fixed wing aircraft, and (2) National Guard Bureau – Camp Ethan Allen Exercise. Agency staff believes cumulative impacts should not be reviewed within the context of only the two exercises discussed in the PEA. The Army should also consider the current training proposal as additional impacts to the already established impacts associated with the training exercises occurring in the MTRs, MOAs and LFAs over the Park today.

We would like to reiterate that the Agency understands and supports the Army's essential training mission as described in the PEA. Agency staff do believe that the information provided in the PEA is insufficient to support a finding of no significant impact and that given the sensitivity and complexity of land uses in the Action Area and in particular the Adirondack Park, the evaluation of the proposal in a more detailed EIS is more appropriate. The Agency has in the past worked closely with the NYANG in the planning and environmental review of changes to the Adirondack Airspace for training purposes. Staff believes the model employed for that work should be undertaken here for this important training program. Again, thank you for the opportunity to provide comment. Agency staff are available and interested in assisting the U.S. Army as it prepares its important training program in the Adirondack Park and the North Country.

Sincerely,

/s/Richard E. Weber

Richard E. Weber  
Deputy Director - Planning

REW:ap

cc. John Ernst, APA State Land Committee Chair  
Terry Martino, Executive Director, APA  
Randall Young, Region 6 Director, DEC  
Joseph Zalewski, Region 5 Director, DEC  
Robert Davies, Director of Lands and Forests, DEC  
Karyn Richards, Forest Preserve Coordinator



-----Original Message-----

From: Rush, Laurie W CIV USARMY (USA)

Sent: Wednesday, August 12, 2020 11:21 AM

To: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA) <cathryn.e.schadock.civ@mail.mil>

Subject: FW: [Non-DoD Source] RE: Programmatic Environmental Assessment (PEA) for Mission and Training Activities

Hi Cait,

Faithkeeper Gonyea's response was included in an email to my private account concerning another matter, and was, "And about the other email with Jesse's comments. I agree."

I can forward an edited version of that correspondence to you if you like.

Laurie

-----Original Message-----

From: Rush, Laurie W CIV USARMY (USA)

Sent: Tuesday, July 7, 2020 8:51 AM

To: [REDACTED]

Cc: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA) <cathryn.e.schadock.civ@mail.mil>; 'Jesse Bergevin' <jbergevin@oneida-nation.org>

Subject: FW: [Non-DoD Source] RE: Programmatic Environmental Assessment (PEA) for Mission and Training Activities

Dear Faithkeeper Gonyea and Mr. Bonaparte, I hope this message finds you doing well as our summer continues to be very warm and sunny. I hope you and your families are staying healthy. I would like to share with you the comment shared by Mr. Bergevin after his careful reading of the Draft Aviation document, and the change that Fort Drum has committed to make to the document as a result of this consultation. As you can see from the correspondence below, we at Fort Drum completely agree with Mr. Bergevin's observation and are happy to make the change. We hope that this change will be agreeable to both of you, and please know that if you have additional changes and observations, we will be very pleased to take them into consideration.

Sincerely,  
Laurie Rush

-----Original Message-----

From: Jesse Bergevin [mailto:jbergevin@oneida-nation.org]

Sent: Tuesday, July 7, 2020 8:37 AM

To: Rush, Laurie W CIV USARMY (USA) <laurie.w.rush.civ@mail.mil>

Cc: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA) <cathryn.e.schadock.civ@mail.mil>

Subject: RE: [Non-DoD Source] RE: Programmatic Environmental Assessment (PEA) for Mission and Training Activities

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Dr. Rush,

That wording would work for me.

Thank you,

Jesse Bergevin | Historic Resources Specialist Oneida Indian Nation | 2037 Dream Catcher Plaza, Oneida, NY 13421-0662 jbergevin@oneida-nation.org | Caution-www.oneidaindiannation.com  
315.829.8463 Office | 315.829.8473 Fax

-----Original Message-----

From: Rush, Laurie W CIV USARMY (USA) [Caution-mailto:laurie.w.rush.civ@mail.mil]  
Sent: Tuesday, July 07, 2020 7:35 AM  
To: Jesse Bergevin  
Cc: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA)  
Subject: RE: [Non-DoD Source] RE: Programmatic Environmental Assessment (PEA) for Mission and Training Activities

Dear Jesse,

Thank you so much for your careful reading of the document and your excellent observation. We completely agree with your concern. We would like to propose changing the wording in the document to "appropriate regulatory agencies and Indian Partner Nations." Does that seem like a good solution to you?

Thanks,  
Laurie

-----Original Message-----

From: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA)  
Sent: Monday, July 6, 2020 10:59 PM  
To: Rush, Laurie W CIV USARMY (USA) <laurie.w.rush.civ@mail.mil>  
Subject: Edited RE: Programmatic Environmental Assessment (PEA) for Mission and Training Activities

Yes. Of course.

I have notified the COE to add the Indian Nation Partners to the language in the PEA.

Cait

Sent from my iPhone



On Jul 6, 2020, at 6:52 PM, Rush, Laurie W CIV USARMY (USA) <laurie.w.rush.civ@mail.mil>wrote:

Can we change the wording Jesse has indicated to "appropriate regulatory agencies and Indian Nation Partners?"

Thanks!

Laurie

-----Original Message-----

From: Jesse Bergevin [Caution-mailto:jbergevin@oneida-nation.org]

Sent: Monday, July 6, 2020 5:24 PM

To: Rush, Laurie W CIV USARMY (USA) <laurie.w.rush.civ@mail.mil>

Cc: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA) <cathryn.e.schadock.civ@mail.mil>

Subject: [Non-DoD Source] RE: Programmatic Environmental Assessment (PEA) for Mission and Training Activities

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VIA E-MAIL laurie.w.rush.civ@mail.mil

Dr. Laurie Rush

United States Army Garrison, Fort Drum

Dear Dr. Rush,

The Oneida Indian Nation (the "Nation") received an email and documentation on June 26, 2020, from the United States Army Garrison, Fort Drum (Fort Drum), regarding the Programmatic Environmental Assessment and Draft Finding of No Significant Impact (the "Documents") for the Proposed Action to increase in-the-air and land-based training activities conducted by the 10th Combat Aviation Brigade and the 10th Sustainment Brigade (the "Action") in the Local Flying Area of Fort Drum. As you know, the Nation stood with the U.S. Army since the Revolutionary War as America's first allies, rendered military assistance in the War of 1812, and Oneidas have fought for the United States in all the major wars since 1812.

In Section 2.0, Description of Proposed Action and Alternatives, the Documents discuss the selection of off-post locations. In this discussion, the Documents note that the "selection of sites would be based on consultation and coordination with the appropriate regulatory agencies". The Nation is in possession of information related to the past land use of Oneida ancestors that is above and beyond those resources available to State and Federal agencies. The Nation requests Fort Drum include the Nation in this consultation and coordination with other agencies on this Action to minimize or avoid impacts to historic properties that may be present at off-post locations.

The Nation looks forward to continued dialogue and consultation with Fort Drum on this Action to help minimize and avoid potential impacts to historic properties.

If you have any questions, please call me at (315) 829-8463.

Thank you,

Jesse Bergevin | Historic Resources Specialist Oneida Indian Nation | 2037 Dream Catcher Plaza, Oneida, NY 13421-0662 jbergevin@oneida-nation.org | Caution-Caution-www.oneidaindiannation.com  
315.829.8463 Office | 315.829.8473 Fax

-----Original Message-----

From: Rush, Laurie W CIV USARMY (USA) [Caution-Caution-mailto:laurie.w.rush.civ@mail.mil]

Sent: Friday, June 26, 2020 9:47 AM

To: Jesse Bergevin

Cc: Schadock, C E (Cait) CIV USARMY ID-READINESS (USA)

Subject: Programmatic Environmental Assessment (PEA) for Mission and Training Activities

Good Morning Jesse,

I hope you are doing well and that you are having a good summer.

This message is to initiate consultation concerning potential aviation training activities that would be based out of Fort Drum. In the past, we have had aviation training events where our aviation brigade helicopters have traveled to Vermont and back. The documents attached here represent our effort to make sure that Fort Drum is conscientiously following environmental guidelines when our aircraft leave our Fort Drum boundaries. The attachments include a draft Programmatic Environmental Assessment for these activities, a letter inviting you to consult and comment from our Garrison Commander, and a copy of the letter that goes to potentially interested members of the general public. Please don't hesitate to contact me if you have any questions or comments. Also, if you would prefer to receive these documents in hard copy form, please let me know and we will get them to you as quickly as we can.

I am sending my best wishes that you and yours are safe and well.

Sincerely,

Laurie

Dr. Laurie W. Rush, RPA, FAAR  
Cultural Resources Manager  
Public Works, Environmental Division  
4896 Nininger Road  
Fort Drum, New York 13602-5097  
Commercial: 315-772-4165  
DSN: 772-4165  
Cell: 315-783-9894

Fort Drum - Home of the Light Infantry

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# ADVOCATE DRUM



Fort Drum Regional Liaison Organization

200 Washington Street, Suite 406  
P. O. Box 775  
Watertown, New York 13601  
(315) 836-1531 Fax: (315) 836-1532  
E-mail: [office@fdrllo.org](mailto:office@fdrllo.org)

July 29, 2020

Ms. Cait Schadock  
NEPA Coordinator  
Directorate of Public Works  
Fort Drum NY 13602

Subject: PEA and Draft Finding of No Significant Impact for Fort Drum 10<sup>th</sup> Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities

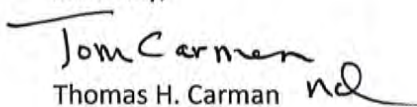
Dear Ms. Schadock:

Advocate Drum and the North Country Community enthusiastically support the proposed increase in the air and land-based training activities conducted by the 10<sup>th</sup> Combat Aviation Brigade and the 10<sup>th</sup> Sustainment Brigade within the Local Flying Area of Fort Drum, New York.

From the beginning this community has rapidly responded to growth and changes at Fort Drum. From the initial stationing of the 10<sup>th</sup> Mountain Division in 1985, to the growth from 10,000 Soldiers to 15,000 Soldiers in 2005 this community has steadfastly supported the needs of our Soldiers, Families and Fort Drum.

We support the Army's need to ensure the aviators of the 10<sup>th</sup> CAB and support units of the 10<sup>th</sup> Sustainment Brigade are provided with practical and realistic flight proficiency and support services training. This proposed action to ensure our national security is essential to prepare and protect our Soldiers in the current military environment.

Sincerely,

  
Thomas H. Carman  
Chair

cc: Senator Kirsten Gillibrand  
Senator Charles Schumer  
Congresswoman Elise Stefanik

Senator Patty Richie  
Assemblyman Kenneth Blankenbush  
Assemblyman Mark Walczyk

*Mission: To protect and enhance Fort Drum's military value, sustain and leverage its economic and cultural significance to the Fort Drum region and New York State, and foster effective communication between the installation and its civilian neighbors to promote mutual support and understanding.*

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***Paul S. Pierce***  
***Deborah J Pierce***  
5 Potter Street  
Carthage, NY 13619  
315-493-2352 (home)  
315-783-0117 (cell)

July 31, 2020

Ms. Cait Schadock, NEPA Coordinator  
Directorate of Public Works  
4896 Jones Street  
Fort Drum, NY 13602

RE: PEA and Draft FONSI – Military Flight Training

Dear Ms. Schadock:

I am writing in response to the public comment period offered for the above Finding of No Significant Impact. I have enclosed some materials for reference.

The Otter Creek Horse Trails and Independence River Wild Forest are comprised of 65 miles of horse trails located on approximately 1800 acres in the Towns of Greig and Watson in Lewis County. The trails are heavily used by riders of all ages from May to October. Visitors come from all over New York State as well as other states to ride, free of charge, on the beautiful trail system. Horse ownership and riding is a 9 billion dollar business in New York State.

As a landowner and equestrian using the Otter Creek System, I disagree with the negative FONSI. I would invite any of the pilots flying “low and slow” over the trails to come out and ride with me while a training exercise is taking place overhead. We are local to the area and our horses are used to helicopters and jets flying overhead. However, when riding an 1100 pound prey animal through the woods and a low level jet flies directly over, all bets are off. I have had the experience several times myself and many other riders have as well. I can’t think of any other activity, sport or otherwise, that is so dramatically affected by these low level flights. As riders, we accept the risks associated with trail riding and while training our horses, we subject them to all kinds of surprises that they may come across. There is just no way to teach them that the all-encompassing roar that fills the woods and that they can’t see is not going to hurt them.

My grandchildren are learning to ride. I ask your commanding officers to consider whether they would put their children and grandchildren on the backs of these large animals and then have a jet fly at low levels over their heads. Riding at Otter Creek is often a family event. The Assembly Area is filled with horse trailers and campers every summer – families that include grandparents down to toddlers. The horses are stalled in tie stalls at the Assembly Area and often the owners are in the stalls taking care of the horses. A jet flying low spooks even the most well-trained horse and can cause severe injuries even if not being ridden.

As local residents, we appreciate and understand that training of our military Soldiers is of the utmost importance to us and our country. Our grandchildren love to watch the planes and helicopters and are learning why they fly in our area. I (and other equestrians) am just asking that the immediate area around the Otter Creek Trail System be avoided. I would invite any member of the assessment group to contact me for a tour of the area (on horseback if they would like) so that they can understand why we love to ride and how absolutely terrifying these low-level flights can be. One of the worst parts about the flights is that we don't know when the planes, which are often flying over the trails, are going to fly at a low level.

I would very much appreciate your consideration of my request and I would also ask that one of the committee members contact me to discuss. I am well aware that it seems a small matter to those in charge but for those of us who live, ride and recreate in Northern New York, it is of serious concern to our safety and the safety of our children, grandchildren and friends. As an example of the distance from the trails that makes a big difference: my husband and I were riding on a trail that is approximately 3 miles from our property when a low level flight went directly over our camp. It was loud in the woods but not enough to spook the horses terribly. A 5 mile avoidance area around the trails would ensure that most horses are not spooked to the point of bolting through the woods.

Thank you for your consideration of my request. There are several Facebook pages with information and photos of riders and campers at Otter Creek. "Friends of Otter Creek Horse Trails", "Trailriders Otter Creek NY" and "Horse Camps at Otter Creek". The Friends of Otter Creek Horse Trails are a group of volunteers dedicated to assisting the NYS Dept. of Environmental Conservation in maintaining and improving the horse trails. The group can provide any additional information that might be of assistance.

Sincerely yours,

A handwritten signature in cursive script that reads "De' Pierce".

Deborah J. Pierce

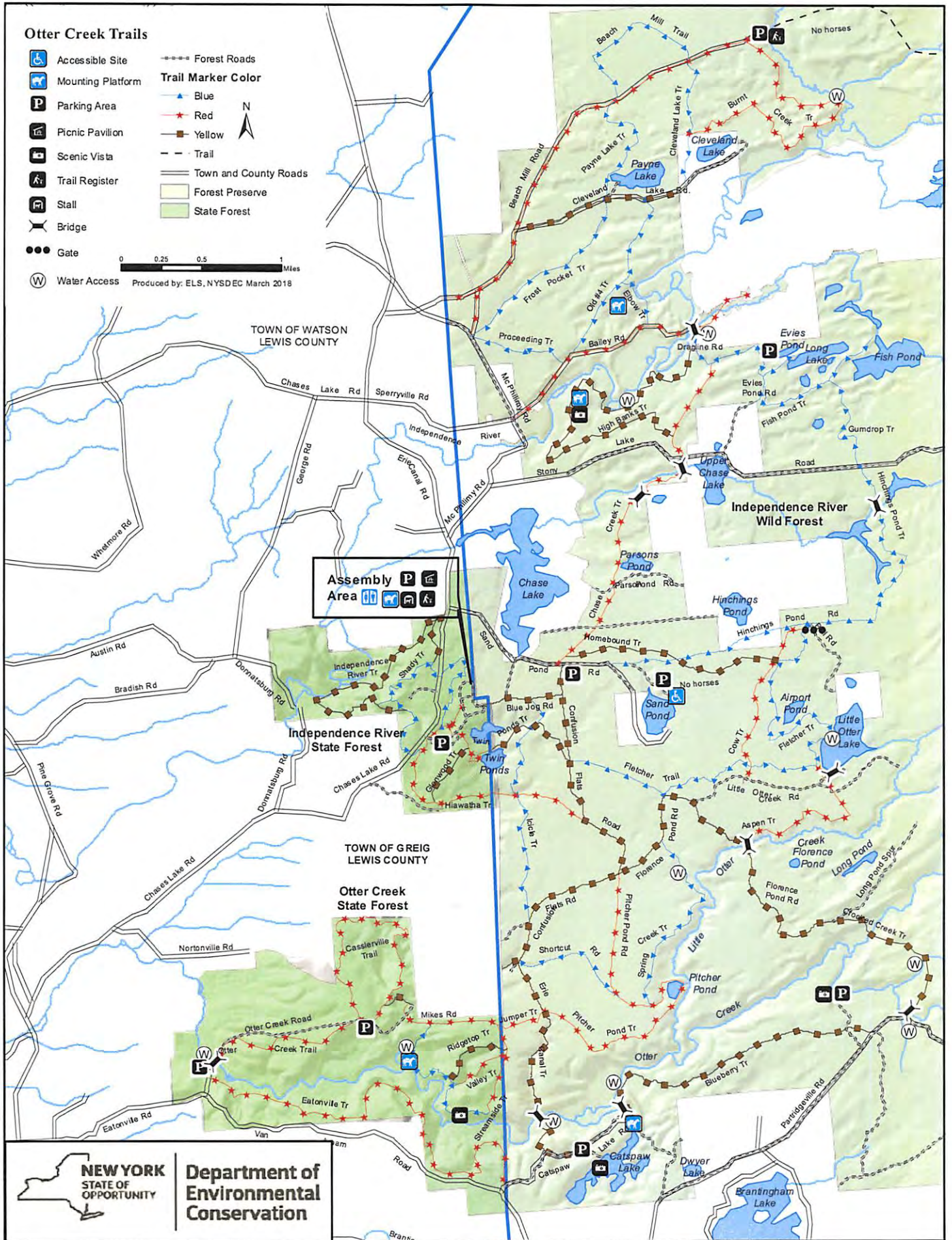


# Otter Creek Trails

- Accessible Site
- Mounting Platform
- Parking Area
- Picnic Pavilion
- Scenic Vista
- Trail Register
- Stall
- Bridge
- Gate
- Water Access
- Forest Roads
- Trail Marker Color**
  - Blue
  - Red
  - Yellow
- Trail
- Town and County Roads
- Forest Preserve
- State Forest

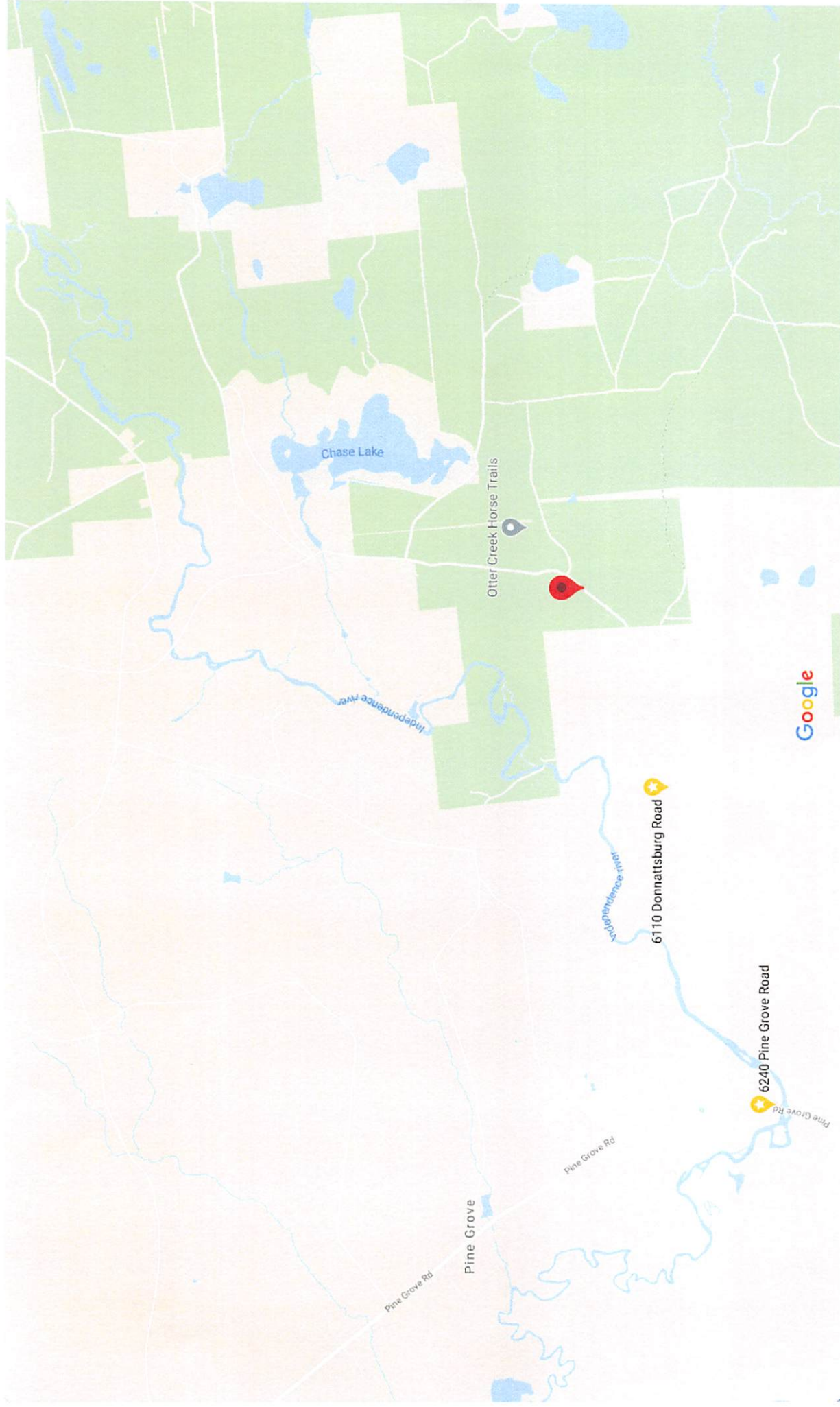
0 0.25 0.5 1 Miles

Produced by: ELS, NYSDEC March 2018



Department of Environmental Conservation









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## Otter Creek State Forest Horse Trails

Adirondack Region

### **Wildlife**

### **Directions & Trail Descriptions**

**Location:** Near Glenfield, NY. Lewis County. Western border of the Adirondack Park.

**Length/Configuration:** 65 miles of interlocking multi-use trails.

**Terrain/Surface:** Mostly old, sandy roads and woods roads.

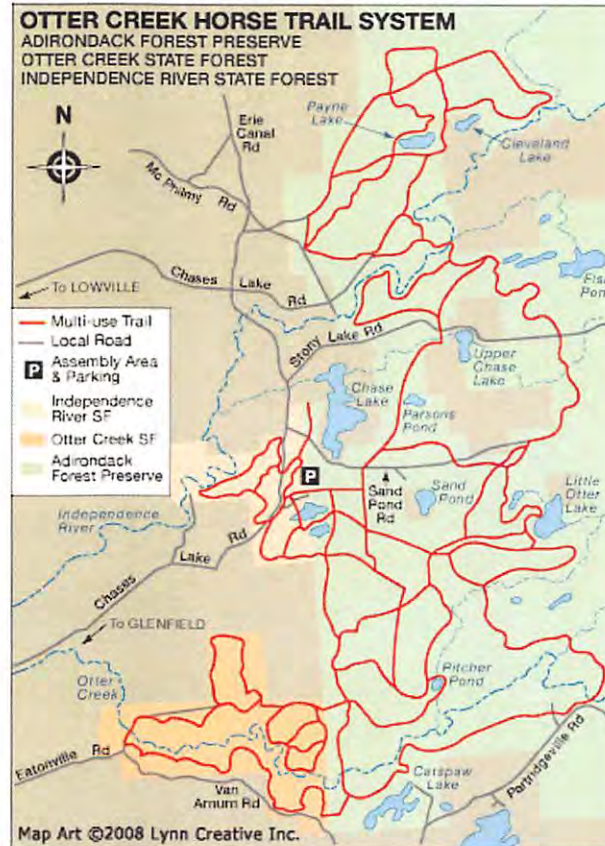
**Technical Difficulty:** All skill levels

**Elevation Change:** Mostly flat or rolling terrain. Some climbs over ridges.

**Caution:** Shared use with equestrians and hikers. Please be considerate of horseback riders and slow down or stop on approach -- say hi to the horses. Do not stray into nearby cottage areas or onto posted private property.

## Nearby Mountain Bike Trails Adirondack Mountains

Mountain Biking Adirondack Mountains



**Note:** This trail map is a graphical representation designed for general reference purposes only. Read Full Disclaimer.

### **Directions:**

From Lowville:

**To Main Assembly Area:** Take Rt.12 south 6 to 7 miles to Glenfield. Turn left onto Main St. and travel through Glenfield to Greig Rd. Travel east on Greig Rd. about 1.9 miles to a T-intersection. Turn left onto Pine Grove Rd. Drive 1.2 miles to Chases Lake Rd. (look for sign), turn right and proceed 3 to 4 miles. Turn left at Horse Trail entrance sign.

**To Independence State Forest Area:** Rt .36 (Number Four Road) 3.5 miles to Rt. 39 (Pine Grove Road) turn left and go 5 miles south to Chases Lake Road. Turn left and proceed 3.25 miles.

**To Otter Creek State Forest:** Number Four Road 3.5 miles to Pine Grove Road. Follow Pine Grove Road 6 miles to Eatonville Road, turn left, proceed 1.2 miles.

Other vehicular access: Otter Creek Forest Access Road (1.5 miles), Mikes Road (1.1 miles), Campsite #1 Road (0.6 mile), and the Oxbow Road (0.5 mile).

### **General Description:**

The Otter Creek Horse Trail System, located at the western edge of the Adirondack Park Preserve not only offers some of the best horseback riding trails in New York State but also provides a

Independence River State Forest, Otter Creek State Forest and Independence River Wild Forest Unit of the Adirondack Preserve. The state built facilities at the Otter Creek Assembly Area located in the Independence State Forest (see trail map above) include trailhead parking, 100 roofed stalls, 2 stud stalls, mounting platforms, toilet facilities and running water. Besides horseback riding and mountain biking, the multi-use trails are open to hiking, cross-country skiing and snowshoeing.

While horses may dream about riding here, this diversified multi-use trail system is often an overlooked recreational resource and classifies as a "best kept secret".

### **Independence State Forest**

The 673 acre Independence State Forest offers a woodland mountain biking experience. Maple, black cherry, native white pine and planted red & scotch pine rest on deep, sandy soil. The Independence River, a small mountain stream which originates in the Western edge of Adirondack Park, cascades through the northern section of the area.

### **Otter Creek State Forest**

7 miles of designated horse trails travel through the 1,206 acre Otter Creek State Forest, named for the trout stream that meanders from east to west through this tract. A gorge cut by the creek offers trail users including mountain bikers and hikers, spectacular views from vistas along the rim.

In addition to the woods of hardwoods and hemlock, ridges, streams and lakes of the uplands, parts of the area have been called the Serengeti of the Adirondacks. 10,000 years ago huge quantities of sand were deposited here from the bottom of a glacial lake. This resulted in flatlands of hardy spirea, low-lying blueberry, ferns and brightly colored lichens.

### **The Trails:**

The well-marked Otter Creek Trail System uses a series of old, sandy roads and woods roads that wind along spirea flats, wooded areas, and picturesque ponds. They provide a variety of terrain and scenery and often pass through remote forested areas populated with wildlife. They follow or cross Otter, Little Otter, Beaver Meadow, Chase, Burnt and Crooked Creeks as well as the beautiful Independence River. Bridges lead across the creeks and marshes.

The riding is fairly easy over terrain that is mostly flat and rolling with an occasional climb over a ridge. The trail surface is sand with some gravel. Well-drained soil makes this a perfect place for mountain biking. Even after heavy rains, the area does not experience the usual muddy conditions. Picnic tables are available at some of the scenic lookouts throughout the area. The possibilities are endless. A day's mountain bike ride would cover only a fraction of the trail system.

### **Trail Highlights:**

Take the Blue Jog Trail from the Assembly Area out to the Confusion Flats Trail. The landscape changes dramatically, opening up to the sandy expanse of the flatlands

Herds of deer can often be spotted from the Twin Pines Trail.

Cross Otter Creek to the Blueberry Trail. A spur trail leads to Buck's Place (Partridgeville Road), a restaurant where you can tie up your horse or bike and have lunch.

### **Other options:**

Natural waterslide on Otter Creek, picnic on Burnt Creek, fishing at Payne Lake Recreation Area, Gleasmann Falls

### **Gleasmann Falls**

For a change of pace, a foot trail, closed to bikes and horses, leads to Gleasmann Falls on the Independence River in the far northeastern section of the Otter Creek Trail Network. Beneath 75 ft. cliffs, the river drops 60 ft. over a series of cascades. The 2.9 mile, yellow-blazed trail takes you through meadows of raspberries and wildflowers and crosses Burnt Creek before heading into the Independence Wild Forest where it connects with other trails in the system.

More places to go mountain biking in the Adirondack Mountains.

### **Wildlife Note:**

coyote, fox, grouse, wild turkey, snowshoe hare and a variety of bird life. Catspaw Lake and Pitcher Pond often have both resident and migratory wild fowl. If you are into fishing, then bring along your rod for some post-ride fishing at the following sites:

**Otter, Little Otter, Beaver Meadow and Crooked Creeks:** brook trout

**Catspaw and Upper Chases Lake:** chain pickerel, brown bullhead and pumpkinseeds

**Pitcher Pond and Payne Lake:** brook trout

**Little Otter Lake:** brown trout, brook trout, pumpkinseeds and brown bullheads

**For more information:**

**NYS DEC**

7327 St Rt 812

Lowville, NY 13367

**Phone:** (315) 376-3521

**TTY:** 711 (AT&T National Relay)

**Website:** New York State DEC

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# ADIRONDACK COUNCIL

PRESERVING WATER,  
AIR AND WILDLANDS

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**Executive Director**  
William C. Janeway

August 4, 2020

Ms. Cait Schadock  
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Dear Ms. Schadock:

Thank you for the opportunity to comment on the environmental assessment for Fort Drum's proposed military training operations involving U.S. Army helicopters and ground troops inside six of the 12 counties that make up the Adirondack Park. The Adirondack Council has worked with nearly every branch of our military services to design training exercises for pilots and ground troops in the Adirondack Park since 1990.

Those exercises have helped to better prepare U.S. troops for adverse conditions abroad, while maintaining the protections afforded to the Adirondack Park by New York law and tradition.

In past cases, we were pleased to participate as part of a group designed to act as a liaison between the military and the public, which included other conservation organizations, community reps and the state's major regulatory agencies, including the Adirondack Park Agency and Dept. of Environmental Conservation. We note with some disappointment that there was no attempt to convene this group – via teleconference or other means -- to provide feedback this time before the Fort offered a formal proposal for public comment.

We did attend the helicopter demonstration at the Fort in April of 2018, along with a few dozen others, but that was the last communication on the subject.

We firmly believe that this process has avoided many conflicts in the past, and made it possible to maintain communications prior to and throughout the training exercises, to ensure transparency and prevent adverse reactions. We urge you to consult past commanders regarding their positive experiences and return to this highly successful model in any subsequent proposals.



In the current plan, as in past plans, we urge the Army to be cautious with the unique natural resources of the Adirondack Park, and seek locations that are resilient enough to withstand the impacts of the helicopter and troop movements, and avoid conflicts with wildlife -- and with other users in areas of the Park that are already overcrowded with visitors.

The Army cites COVID-19 as the reason it didn't hold public outreach sessions for this proposal, which is understandable, but isn't an excuse for not holding conference calls with stakeholders or conducting on-line outreach. The crisis has had an impact here as well.

Due to travel restrictions and the Adirondack Park's proximity to the major cities of the Northeast, we have seen in 2020 a record-breaking surge in the number of visitors to the park's Forest Preserve. Consequently, we urge the Army to prepare for just two missions in this plan, rather than six. This will help avoid the spread of the disease, while providing the state with time to assess the impacts, as it also copes with managing the crowds and an already-strained search-and-rescue network in the Park.

We note (and hope to have confirmation from the Army) that the precautions you describe preclude the Army from using the Adirondack Forest Preserve for any of the two or six intensive training missions it seeks permission to undertake. We would support this conclusion, given that the Army's needs for the staging area also appear to preclude any use of Adirondack Forest Preserve.

For example, in "Criteria for Selecting Possible Exercise Locations" the plan cites the need for sites of five to 10 acres, with few or no trees and primarily grass and shrubs as cover. Such sites are few on the Forest Preserve, aside from mountaintops and wetlands. You preclude mountain summits by limiting the slope to 5% or less. You state that you intend to avoid all wetlands.

The plan's criteria also say the Army intends to "avoid protected lands, parks and recreation areas, if possible." While it is not possible to avoid the entire Adirondack Park while making use Fort Drum's military training airspace, it is possible to avoid the park's public lands, all of which are Constitutionally protected Forest Preserve (Article 14, Section 1).

In addition, the plan notes that the Army will "avoid properties and sites listed on the National Register of Historic Properties." Please note that the entire Forest Preserve is a National Landmark, which should afford it even greater protection from disturbance than an historic site.

Avoiding the Forest Preserve would aid the Army in achieving its goal to avoid disturbing threatened or endangered species and avoid impacts to other native wildlife.

The plan's description of the potential environmental impacts from the training exercises would also argue against Forest Preserve use. Table 1, Summary of Environmental Impacts says:



Impacts could include removal of vegetation from clearing, crushing, or trampling; spreading of invasive species from soil disturbances; and disturbances to wildlife, including threatened or endangered species, and habitats from noise and visual disturbances during training exercises. There could also be long-term impacts from habitat alteration, mortality of individual animals, or destruction of nests and eggs of ground-nesting birds.

So, in your efforts to seek a private-land site for your exercises, we are pleased to see the Army will consult with the U.S. Fish and Wildlife Service and NYS DEC. We recommend it also work with the Adirondack Park Agency, which administers the Adirondack Park State Land Master Plan as well as the Adirondack Park Private Land Use and Development Plan.

Wetland regulations, for example, are administered in Onondaga, Jefferson and Oswego counties by the DEC, while they are the purview of the APA in all of Essex and Hamilton counties and parts of St. Lawrence, Oneida, Herkimer and Lewis counties. The rules are stricter inside the park than outside. If the Army's training exercises constitute a significant change in use for lands inside the Park, even a temporary change would be best overseen by the APA.

We look forward to further discussion of the project as the NEPA review continues.

Sincerely,

**John Sheehan**

Director of Communications

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5 August 2020

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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 10<sup>th</sup> Combat Aviation Brigade and the 10<sup>th</sup> 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,<sup>1</sup> 46-Corners Management Unit,<sup>2</sup> Aldrich Pond Wild Forest,<sup>3</sup> Alger Island Campground,<sup>4</sup> Black River Wild Forest,<sup>5</sup> Blue Mountain Wild Forest,<sup>6</sup> Blue Ridge Wilderness,<sup>7</sup> Bog River Complex,<sup>8</sup> St Lawrence Flatlands Management Unit,<sup>9</sup> Brown Tract Pond Campground,<sup>10</sup> Camp Santanoni Historic Area,<sup>11</sup> Cedarlands Conservation Easement,<sup>12</sup> Conifer-Emporium CE,<sup>13</sup> Cranberry Lake Complex,<sup>14</sup> Croghan Tract CE,<sup>15</sup> Crown Point

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

### 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,<sup>102</sup> **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,<sup>103</sup> tiering is appropriately used when future environmental reviews are tiered to an Environmental Impact Statement (EIS), not an Environmental Assessment (EA).<sup>104</sup>**

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.<sup>105</sup> 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.<sup>106</sup>

### Significant Impact of the Proposed Action

The proposed action will have a significant impact on the *human environment*.<sup>107</sup> 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.”<sup>108</sup>

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 region<sup>109</sup> of the LFA and the affected interests <sup>110</sup> 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 action<sup>111</sup> 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.

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<sup>1</sup> <https://www.dec.ny.gov/lands/97049.html>  
[https://www.dec.ny.gov/docs/regions\\_pdf/adkfhilldraft3.pdf](https://www.dec.ny.gov/docs/regions_pdf/adkfhilldraft3.pdf)

<sup>2</sup> <https://www.dec.ny.gov/lands/44921.html>  
[https://www.dec.ny.gov/docs/regions\\_pdf/46cornerstxt.pdf](https://www.dec.ny.gov/docs/regions_pdf/46cornerstxt.pdf)  
<sup>3</sup> <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/aldrich.pdf)  
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<sup>4</sup> <https://www.dec.ny.gov/outdoor/24451.html#ump>  
[https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/algerump.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/algerump.pdf)

<sup>5</sup> <https://www.dec.ny.gov/lands/75310.html#Planning>  
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<sup>6</sup> <https://www.dec.ny.gov/lands/101641.html#Planning>  
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<sup>7</sup> <https://www.dec.ny.gov/lands/22608.html>  
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<https://www.dec.ny.gov/lands/100449.html>

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[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/bogumpamend.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/bogumpamend.pdf)

<sup>9</sup> <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)

<sup>10</sup> [https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/browntractfinalump.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/browntractfinalump.pdf)  
<https://www.dec.ny.gov/outdoor/24456.html>

<sup>11</sup> <https://www.dec.ny.gov/lands/53095.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/santanonump1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/santanonump1.pdf)



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- <sup>12</sup> <https://www.dec.ny.gov/lands/108144.html>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/cedarlandsfinalrmp.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/cedarlandsfinalrmp.pdf)
- <sup>13</sup> <https://www.dec.ny.gov/lands/34715.html#Planning>
- <sup>14</sup> <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/cranberryump.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/fcwumpamen1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/fcwumpamen1.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/crandraft.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](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/clblumpamen1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/clblumpamen1.pdf)
- <sup>15</sup> <https://www.dec.ny.gov/lands/8086.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/croghandrafrmp.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/croghandrafrmp.pdf)
- <sup>16</sup> <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>
- <sup>17</sup> <https://www.dec.ny.gov/lands/7991.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/ebfcrmp.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/ebfcrmp.pdf)
- <sup>18</sup> <https://www.dec.ny.gov/lands/90727.html>  
[https://www.dec.ny.gov/docs/regions\\_pdf/elodraftump.pdf](https://www.dec.ny.gov/docs/regions_pdf/elodraftump.pdf)
- <sup>19</sup> [https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/eighthlakefinalump.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/eighthlakefinalump.pdf)  
<https://www.dec.ny.gov/outdoor/24465.html#ump>
- <sup>20</sup> <https://www.dec.ny.gov/lands/91888.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/eclmcpplan.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/eclmcpplan.pdf)
- <sup>21</sup> <https://www.dec.ny.gov/lands/114279.html#Planning>
- <sup>22</sup> <https://www.dec.ny.gov/outdoor/24466.html#ump>
- <sup>23</sup> <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>
- <sup>24</sup> <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/fivepondsump.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/fpwamend1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/fpwamend1.pdf)
- <sup>25</sup> <https://www.dec.ny.gov/outdoor/24467.html#ump>
- <sup>26</sup> [https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/algerump.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/algerump.pdf)  
<https://www.dec.ny.gov/outdoor/24451.html#Planning>
- <sup>27</sup> <https://www.dec.ny.gov/lands/75305.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/fcwump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/fcwump.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/fcwumpamen1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/fcwumpamen1.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/fcwumpamen2.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/fcwumpamen2.pdf)
- <sup>28</sup> <https://www.dec.ny.gov/lands/100750.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/giant1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/giant1.pdf)
- <sup>29</sup> <https://www.dec.ny.gov/outdoor/24468.html#ump>
- <sup>30</sup> <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/gore2002ump.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/gore2002eis.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/gore20182.pdf)

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

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<sup>52</sup> [https://www.dec.ny.gov/docs/permits\\_ej\\_operations\\_pdf/pisecofinalump2017.pdf](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/pisecofinalump2017.pdf)  
<https://www.dec.ny.gov/outdoor/24479.html#ump>

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

<sup>54</sup> [https://www.dec.ny.gov/docs/regions\\_pdf/mohawkvistafinal.pdf](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

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

<sup>56</sup> <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/mrpwfump1.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/mrpwfump2.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/mrpwfump4.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/mrpwfamend.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/mrpwfamend.pdf)

<sup>57</sup> <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/mvhump1.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/mvhump2.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/mvh2018ump.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/mvh1999ump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/mvh1999ump.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/mvh1999eis.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/mvh1999eis.pdf)

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

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

<sup>60</sup> <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](https://www.dec.ny.gov/docs/regions_pdf/oneidahillsdrump.pdf)

<sup>61</sup> <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/camumpone.pdf)  
[https://www.dec.ny.gov/docs/regions\\_pdf/camumptwo.pdf](https://www.dec.ny.gov/docs/regions_pdf/camumptwo.pdf)

<sup>62</sup> <https://www.dec.ny.gov/lands/80005.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/oswegatchiefinalrmp.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/oswegatchiefinalrmp.pdf)

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

<sup>64</sup> <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/pbwump.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/pepprbxamend.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/pepprbxamend.pdf)

<sup>65</sup> <https://www.dec.ny.gov/lands/107648.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/plwump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/plwump.pdf)

<sup>66</sup> <https://www.dec.ny.gov/lands/102484.html#Planning>  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/pigeonump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/pigeonump.pdf)

<sup>67</sup> <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](https://www.dec.ny.gov/docs/permits_ej_operations_pdf/pisecofinalump2017.pdf)

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

<sup>69</sup> <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/rbwfinal.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/whwfplanonly.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/bigmooseirmp.pdf)  
[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/fivemileirmp.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/seveysirmp.pdf)

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[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/bigtupperirmp.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/bigtupperirmp.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

<sup>70</sup> <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/remplacidump.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/rlptcamend2.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/rlptcamend2.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/rlptcamend3.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/rlptcamend3.pdf)

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

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/srcafina1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/srcafina1.pdf)

<sup>73</sup> [https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/srmfthafina1.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/srmfthafina1.pdf)

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

<sup>74</sup> <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/salmonrivertext.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/salmonriverappendicies.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/salmonriverappendicies.pdf)

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

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/saranaclakesump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/saranaclakesump.pdf)

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/scaroonump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/scaroonump.pdf)

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/spblpfump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/spblpfump.pdf)

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/sentinelump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/sentinelump.pdf)

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

<sup>81</sup> <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/siameseump.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/spwumpamend.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/spwumpamend.pdf)

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/slwaump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/slwaump.pdf)

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/srwfinal.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/srwfinal.pdf)

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/stlflatump.pdf](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

<sup>85</sup> <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

<sup>86</sup> <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

<sup>87</sup> <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/docs/lands_forests_pdf/tpmcump.pdf)

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

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

<sup>89</sup> <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

<sup>90</sup> <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

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/boathuntfishrmp.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/boathuntfishrmp.pdf)

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

[https://www.dec.ny.gov/docs/regions\\_pdf/upsalump.pdf](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.

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/vmwfpplanonly.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/vmwfpplanonly.pdf)

Hyslop CE [https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/hyslopdraftmp.pdf](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/cctp.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/vmwfamend3.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](https://www.dec.ny.gov/docs/lands_forests_pdf/boathuntfishrmp.pdf)

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

[https://www.dec.ny.gov/docs/regions\\_pdf/viennadrump.pdf](https://www.dec.ny.gov/docs/regions_pdf/viennadrump.pdf)

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

<sup>95</sup> <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/watumpfinal.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/watonsamend.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/watonsamend.pdf)

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/westwardump.pdf](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

<sup>97</sup> <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/wfvol1ump.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/wfvol2ump.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/wfvol2ump.pdf)

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

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

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/whitney.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/whitney.pdf)

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

<sup>101</sup> <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/wwfwholeplan.pdf)

[https://www.dec.ny.gov/docs/lands\\_forests\\_pdf/wwfdraftamend.pdf](https://www.dec.ny.gov/docs/lands_forests_pdf/wwfdraftamend.pdf)

<sup>102</sup> Alternative #1 is 6 events per year

<sup>103</sup> [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)

<sup>104</sup> [https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e878e6e44364af2003ddaf3782a1fb17&mc=true&r=PART&n=pt40.37.1502#se40.37.1502\\_120](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e878e6e44364af2003ddaf3782a1fb17&mc=true&r=PART&n=pt40.37.1502#se40.37.1502_120)

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

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

<sup>107</sup> 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](https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=e878e6e44364af2003ddaf3782a1fb17&mc=true&r=PART&n=pt40.37.1508#se40.37.1508_113)

<sup>108</sup> <https://www.law.cornell.edu/cfr/text/40/1508.27#:~:text=%C2%A7%201508.27%20Significantly%20affected%20interests%2C%20and%20the%20locality.>

<sup>109</sup> (40 CFR § 1508.27 (a))

<sup>110</sup> 40 CFR § 1508.27 (a)

<sup>111</sup> 40 CFR § 1508.27 (b)





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".

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

P.O. Box 9247  
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518-469-4081 (work cell)  
[dgibson@adirondackwild.org](mailto:dgibson@adirondackwild.org)

cc: Richard Weber, NYS Adirondack Park Agency  
Robert Davies, NYS Department of Environmental Conservation

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6 Aug 2020  
Roselyn Taylor

21382 Main Rd.

Adams Center, NY 13606

Cait Schadock

US Army Installation Fort Drum

NWPA Coordinator, Directorate of Public Works

4896 Jones St.

Fort Drum, NY 13602-5097

Ms. Schadock,

I am writing to express my deep concern for the safety of people and horses in regard to jets flying over the NYS Trails at Otter Creek. There are ten barns that hold about twelve horses each along with riders and visitors which could number in the hundreds.

Medical support is provided by volunteers with basic equipment. There is one hospital in Lowville. Helicopters are not nearby.

Two years ago my granddaughter and I were camping in the third area. There was a young couple across the way that went out for a trail ride. About a half hour later the man came rushing in leading his wife's horse. He was throwing gear in the trailer and frantically trying to load the horses. We went over to help and he told us the jets had scared a deer and his wife's horse slammed her into a tree. He called 911 and the medical helicopter came to take her to Syracuse. He said she was unconscious and the medic's were concerned if she would live. I don't know the outcome but it was certainly a terrifying experience.

I have personally seen many close calls and have been worried for my own safety.

There have been many other accidents due to the noise and the low flying huge jets. You can have a completely trained horse and it can bolt when these jets fly so low. It really hurts my ears, especially when they make the BOOM sound. The

horses can be injured when they are in a tie stall. I have seen injuries from them rearing and hitting their heads on beams.

I urge the people conducting the impact study to look closely at the accidents the jets have caused. They may want to review accident records the NYS Dept. of Environmental Conservation may have. There is an office in Lowville (Region 6).

Thank you,

A handwritten signature in cursive script that reads "Roselyn Taylor". The signature is written in black ink and is positioned above the printed name.

Roselyn Taylor



**Board of Directors**

October 15, 2020

Charles Clusen  
*Chair*

Ms. Cait Schadock  
National Environmental Policy Act Coordinator  
Directorate of Public Works  
4896 Jones St.  
Fort Drum, NY 13602-5097

Marilyn DuBois  
James McMartin Long  
Michael Wilson  
*Vice-Chairs*

Barbara Rottier  
*Secretary*

**RE: Public Comment on Programmatic Environmental Assessment for Fort Drum 10<sup>th</sup> Mountain Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities**

David Quinn  
*Treasurer*

Protect the Adirondacks has reviewed the Programmatic Environmental Assessment for "Fort Drum 10<sup>th</sup> Mountain Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities" released in June 2020 (henceforth the Programmatic Environmental Assessment will be referred to as "PEA"). The document details a wide breadth of activities outlined, but fails to show an understanding of important New York State environmental laws, the Adirondack Park, the 2.6-million-acre public Adirondack Forest Preserve, and basic management of Forest Preserve lands classified Wilderness areas. Protect the Adirondacks finds the activities outlined in the PEA are best suited for State Forest areas outside the Adirondack Park or on state conservation easement lands, which are abundant in the western Adirondacks near Fort Drum. These state lands have large cleared areas for log landings and sorting, an extensive road system used by a range of different motor vehicles, and forests that are logged. These areas would provide a remote and wild settings, far from residences and public recreation opportunities. The large encampments and extensive use of motor vehicles proposed in Alternatives 1 and 2 are simply not appropriate – or legal – on the public Forest Preserve.

Nancy Bernstein  
Richard Booth  
John Caffry  
Andy Coney  
Dean Cook  
James Dawson  
Lorraine Duvall  
Robert Glennon  
Roger Gray  
Evelyn Greene  
Sidney Harring  
Peter Hornbeck  
Dale Jeffers  
Mark Lawton  
Peter O'Shea  
Philip Terrie  
Chris Walsh

Below, please find comments on a number of issues in the PEA that should be addressed by the US Army.

Peter Bauer  
*Executive Director*

**Scope of Project**

The PEA outlines "air and land-based training activities" to possibly take place across nine counties in Upstate New York, including four (St. Lawrence, Lewis, Oneida, Herkimer) that are partially within the Adirondack Park, and two (Hamilton, Essex) that are entirely within the Adirondack Park Blue Line (boundary). These training sessions would combine air and on-ground motor vehicle activities and run for 14 days, with a 7-day

clean-up period to “return the property to its condition prior to the exercise,” hence totaling 21 days. The PEA calls for as many as six training actions a year, for a total of 126 days.

The impacts associated with these events would be significant. The PEA states:

Temporary off-post locations would be used in support of training scenarios, training aids (i.e., training emitters during division exercises for aviation detection), and temporary sustainment sites (e.g., providing food, water, sleep area, shower, fuel, communications). Sustainment sites would include tent structures for sleeping, meetings, meals, and maintenance of equipment. Other areas within the sustainment sites would include generators, fuel containers, fuel dispensing trucks, food kitchen, storage containers, and parking areas for supply trucks. (p FNSI-ii)

Most important, Alternatives 1 and 2 call for use of cleared areas of 5 to 10 acres and that these areas must be free of trees. Such cleared areas are not widespread in the Forest Preserve in the six counties listed in the PEA, or anywhere else for that matter.

#### Forest Preserve is Unsuitable for Proposed Activities

After review of the Programmatic Environmental Assessment for “Fort Drum 10<sup>th</sup> Mountain Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities,” Protect the Adirondacks does not agree with the draft finding of no significant impacts. The PEA fails to adequately address the history, laws, and constitutional protections of the Forest Preserve in the Adirondack Park. The PEA outlines suitable areas for its proposed training activities in “Table FNSI-1 Criteria for Selecting Possible Exercise Locations,” which details suitable sites of 5 to 10 acres in size. Four criterion in Table FNSI-1 make use of the Forest Preserve unsuitable.

The “Vegetative Cover” criterion calls for “Preferably grass, fields with few to no trees or shrubs.” There are very few such places, if any, in the Forest Preserve with “few to no trees.” Please note that campers in the Forest Preserve must use only dead and downed wood for camp fires; no standing live or dead trees are allowed to be used. Campers are fined for cutting standing trees. There is also a significant body of case law that bars the “destruction” of trees on the Forest Preserve because the New York Constitution specifically protects Forest Preserve trees against destruction. Here’s Article 14, Section 1, of the State Constitution:

The lands of the state, now owned or hereafter acquired, constituting the forest preserve as now fixed by law, shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private, nor shall the timber thereon be sold, removed or destroyed.

Under the State Constitution, trees cannot be cut down or cleared to create a 5 to 10 acre clearings to facilitate the proposed activities in the PEA for Alternatives 1 and 2.

The “Soil Type” criterion calls for “Well-drained and dry (no wetlands or floodplains); loam or clay soils without a lot of rocks; avoid prime farmland.” Such sites will be difficult, if not impossible, to locate on

the Forest Preserve. The “Land Ownership” criterion calls for “Public lands with signed Memorandum of Agreement or private land with a lease agreement; avoid protected lands, parks and recreation areas, if possible.” The Forest Preserve, in its essence, is “protected lands” where public recreation is a high value. The “Cultural Resources” criterion calls for avoiding “properties and sites listed on the National Register of Historic Properties; avoid Tribal land.” It’s important to note that the entire public Forest Preserve in New York State is listed on the National Register of Historic Places.

There’s a case to be made that two other criterion, “Wetlands” and “Threatened or Endangered Species,” also pose major obstacles, but it’s clear that four criterion clearly make the Forest Preserve unsuitable for proposed training activities. Based on the criteria in Table FNSI-1 the Forest Preserve is unsuitable for proposed activities detailed in the PEA for Alternatives 1 and 2.

### Proposed Activities Would Cause Negative Environmental Impacts

“Table FNSI-2 Summary of Environmental Impacts” lists 10 “resources.” Protect the Adirondacks believes that it is highly likely that the activities proposed in Alternatives 1 and 2 would negatively impact three of the 10 resources listed.

First, the “Land Use” resources calls for “Because training is temporary, any impacts to land use would be short-term in nature. Schools, churches, and populated areas would be avoided. It is recommended if parks and recreation areas are used, they are avoided during peak times (hunting, fishing, and boating seasons). Coordination with owner would occur prior to the start of training exercises. Impacts to land use would be adverse, short-term and minor as no permanent changes to designated land uses would be made. Tiered NEPA analysis would determine the impact once sites have been selected.” This is a broad category. The Forest Preserve units in the six counties referenced in the PEA (St. Lawrence, Lewis, Oneida, Herkimer, Hamilton, Essex) are used by the public for outdoor recreation nearly continuously. Please note that in an average calendar year in New York, the fishing season begins on April 1<sup>st</sup>, with later start dates for different species. Some fishing seasons close in the fall, others continue through March 15<sup>th</sup> because of the popularity of winter ice fishing. Hunting seasons start in late September and run through December. Trapping seasons start in the fall and many run through the winter into March.

Outdoor public recreation intensifies in the spring in May with active hiking, camping, and mountain-biking and runs deep into the fall. Winter hiking, snowshoeing, cross-country skiing, and camping are also popular and run through the winter into late March. Snowmobiling is popular and begins at the end of hunting season in December and runs through the winter into March.

In short, there are few times of the year that the proposed activities detailed in Alternatives 1 and 2 will not have negative impacts on land use, mostly on the millions who use the Forest Preserve for a variety of outdoor recreational activities.

Second, Table 2 lists “Noise” and states “Training exercises are short-term. Helicopter overflights associated with the training exercises would be infrequent and of a short duration. Aviators are instructed to avoid flyovers of residential areas, known wildlife refuges, and livestock. For areas where aviators



takeoff, land, and hover, and during engine run-ups, receivers of noise may experience additional disturbances. The number and amount of disturbances will also be dependent on the number of aircraft involved in the training exercises. Therefore, noise impacts on human annoyance and domestic animals would be adverse, short-term, and range from negligible to minor. Noise impacts on wildlife would be adverse, short-term, and range from negligible to moderate.” We note that while there is considerable information on noise generated by different helicopters and motor vehicles, the literature cited by the PEA on wildlife impacts is two decades old and not specifically related the terrain and habitat of the Northeast U.S. Moreover, there is little about noise intrusions into public Wilderness where quiet, interrupted only by the sounds of wild nature, dominates and is one of the virtues of Wilderness. Due to the limited amount of information in the PEA, it’s impossible to assess noise impacts from the training activities proposed in Alternatives 1 and 2. Much more information is necessary.

Third, as discussed above, we believe that the “biological” resources would experience long-term negative impacts due to tree cutting to create 5 to 10 acre clearings. “Biological Resources” in Table FNSI-2 calls for “Training activities would result in adverse, short- and long-term, negligible to moderate impacts to biological resources. Impacts could include removal of vegetation from clearing, crushing, or trampling; spreading of invasive species from soil disturbances; and disturbances to wildlife, including threatened or endangered species, and habitats from noise and visual disturbances during training exercises. There could also be long-term impacts from habitat alteration, mortality of individual animals, or destruction of nests and eggs of ground-nesting birds. Implementing appropriate conservation measures and terms and conditions and following permit conditions would ensure that adverse impacts are avoided, minimized, or mitigated as necessary. Final conservation measures would be developed in consultation with USFWS and NYSDEC at the time of site selection.” Clearly, “removal of vegetation from clearing, crushing, or trampling” of trees is prohibited by the State Constitution. Furthermore, cutting of trees is long-term damage.

Fourth, under “Cultural Resources” Table FNSI-2 calls for “Known historic resources would be avoided. However, training exercises have the potential to impact unknown archaeological resources. BMPs would be followed to ensure impacts to cultural resources remain minor. Impacts to cultural resources would be adverse, short- or long-term and minor to moderate.” As stated above, the Forest Preserve is listed on the National Register of Historic Places.

Contrary to statements in the PEA, Protect the Adirondacks finds that there could be longstanding negative environmental impacts to the resources on the public Forest Preserve.

#### State Agency Jurisdictions

It is our belief that some of the actions detailed in Alternatives 1 and 2 in the PEA will require permits from the Adirondack Park Agency (APA) or amendments to the Adirondack Park State Land Master Plan, which sets out the rules and regulations for the public Forest Preserve. It is also our understanding that the APA has requested additional information because the PEA contains insufficient information for it to evaluate the full range of impacts.

In New York, the Forest Preserve is jointly managed by the APA and the Department of Environmental



Conservation. We have requested, but not yet received, DEC's comments on the PEA. The PEA appears not to fully understand the dual-management roles of the APA and DEC on the public Forest Preserve.

**Full Environmental Impact Statement:** The sheer scope of the proposed trainings on public lands totaling 126 days of air and on-ground motor vehicle activities requires a full EIS. This is necessary for regulatory agencies to fully assess the range of impacts.

**NYS Freshwater Wetlands Act:** It's unclear from the PEA whether a Freshwater Wetlands Act permit would be required from the APA. We note that wetlands are of high value and great abundance in the six counties listed in the PEA for possible locations in Alternatives 1 and 2. We also note that this type of project may involve the U.S. Army Corp of Engineers.

**Wilderness Areas:** There are nearly 1.2 million acres of Wilderness in the Adirondack Park and five of the six counties referenced in the PEA as being partly or entirely with the Park have Wilderness. While the PEA references "wilderness" as existing in Herkimer and St. Lawrence counties (p 25) it fails to state that wilderness is major land area in Essex, Hamilton, and Lewis counties. A search of the PEA only found two references to Wilderness lands.

The fundamental purpose of a Wilderness area is that it is a protected landscape where ecological processes are allowed to proceed unimpacted by humans to the greatest extent possible. As a result, human impacts are minimized to those caused by walking, paddling, or cross-country skiing. A central tenet of Wilderness area management is the absence of motor vehicles or bicycles from a large landscape. Wilderness areas by their basic definition are supposed to receive the lightest of impacts from human recreational activities. Additionally, Wilderness areas have group size limits that are well below the sizes of the training activities outlined in the PEA. The Adirondack Park State Land Master (APSLMP) articulates this purpose in its basic definition of Wilderness:

A wilderness area, in contrast with those areas where man and his own works dominate the landscape, is an area where the earth and its community of life are untrammelled by man--where man himself is a visitor who does not remain. A wilderness area is further defined to mean an area of state land or water having a primeval character, without significant improvement or permanent human habitation, which is protected and managed so as to preserve, enhance and restore, where necessary, its natural conditions, and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least ten thousand acres of contiguous land and water or is of sufficient size and character as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological or other features of scientific, educational, scenic or historical value. (p 22)

The basic Wilderness definition states that lands classified as Wilderness should be managed in a wild, natural, untrammelled state where any impacts or marks of humans are difficult to detect. Protect the Adirondacks finds that the scope of activities in the PEA are incompatible with Wilderness lands in the Adirondack Park. The Wilderness guidelines in the APSLMP, partly quoted above, simply do not allow the proposed activities in the PEA in Wilderness Areas.

**State Land Master Plan:** The APSLMP classifies the Forest Preserve into a number of different land use types. The APSLMP places a premium on natural resource protection: “If there is a unifying theme to the master plan, it is that the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded.” (p 1)

In addition to Wilderness areas, the biggest Forest Preserve classification is “Wild Forest,” which generally allows a higher degree and more intensive forms of outdoor recreation. Wild Forest areas, for example, allow motor vehicle use on roads and snowmobile use on designated snowmobile trails.

While motorized activities are authorized in Wild Forest areas, clearings of 5 to 10 acres do not exist. The PEA states that its field training activities require clearings of 5 to 10 acres and these would not be possible even in Wild Forest areas where some kinds of motor vehicle use is allowed.

#### Article 14 and the State Constitution

The Adirondack Forest Preserve is protected by the State Constitution. Constitutional protections were provided to the Forest Preserve in Article 14, Section 1 at the 1894 Constitutional Convention (then Article 7, Section 7) and have remained unchanged ever since. The Constitutional protections for the Forest Preserve sets these lands apart from other public lands.

We note that in the PEA there is only one mention of the State Constitution and its use is inaccurate: “Hamilton County lies entirely within the Adirondack Park and is the least populated county in New York. Because Hamilton County is located in the Adirondack Park, any development in the county is limited by the NYS Constitution, which protects the park land. Most of the park land is publicly owned. Hamilton County offers forested mountains, 77 major lakes, and countless plunging streams. The county has nine towns and one incorporated village. Tourism is the most important industry and the whole area is a favorite spot for vacationers and recreationalists.” Development in Hamilton County on private lands is regulated jointly by the APA and local governments. The Forest Preserve, which is public land, is protected under the State Constitution and managed jointly by the APA and DEC.

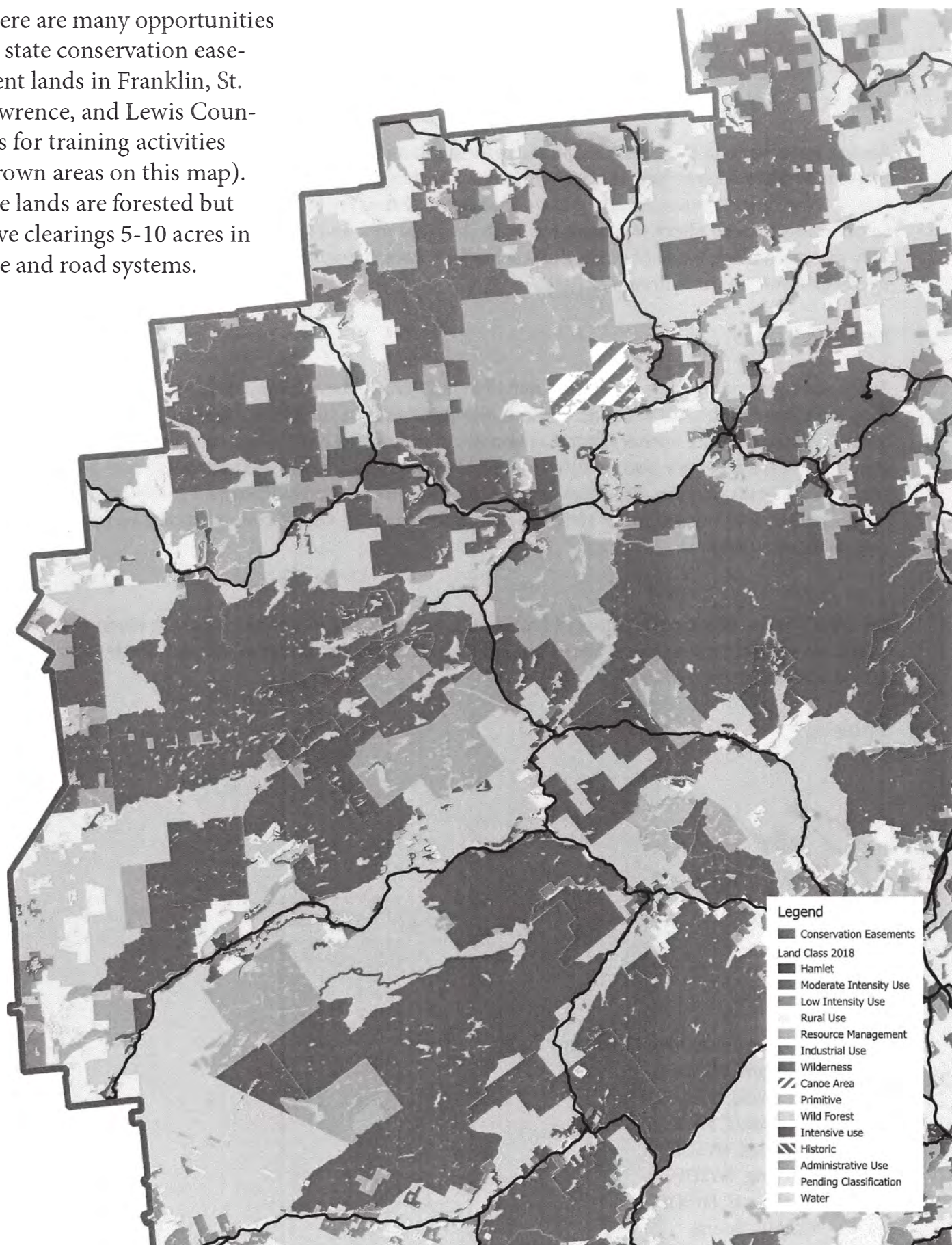
Here’s Article 14, Section 1, of the State Constitution:

The lands of the state, now owned or hereafter acquired, constituting the forest preserve as now fixed by law, shall be forever kept as wild forest lands. They shall not be leased, sold or exchanged, or be taken by any corporation, public or private, nor shall the timber thereon be sold, removed or destroyed.

Under the State Constitution, trees cannot be cut down or cleared to create a 5 to 10 acre clearing to facilitate the proposed activities in the PEA for Alternatives 1 and 2.



There are many opportunities on state conservation easement lands in Franklin, St. Lawrence, and Lewis Counties for training activities (brown areas on this map). The lands are forested but have clearings 5-10 acres in size and road systems.



### Stakeholder Group

Recent statements in the press and public correspondence announced that some form of stakeholder group may be formed to help the 10<sup>th</sup> Mountain Division assess the viability of different locations in the North Country for training air and ground training activities. Protect the Adirondacks would be pleased to help with such an effort. We note that both the New York and Vermont Air National Guards successfully managed these types of public outreach efforts, which helped to both meet the national defense needs and protect the Adirondack Park.

### Recommendation

The air and ground training activities outlined in the PEA will have a major impact on wild places where they are staged in the North Country. These activities are best suited for managed forestlands, such as State Forests and State Conservation Easements, that have the road infrastructure and open clearings required. These areas are also remote from residential areas and possess extensive open space tracts of tens of thousands of acres. The large conservation easements north of Route 3 in St. Lawrence County may be suitable to the proposed activities detailed in the PEA. Use of conservation easement lands should be evaluated.

On behalf of the Board of Directors of Protect the Adirondacks, please accept these comments on proposed air and field training operations on public lands in the Adirondack Park and North County by the 10<sup>th</sup> Mountain Division of the US Army.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer", with a stylized, cursive script.

Peter Bauer  
Executive Director

CC: A. Lefton, Executive Chamber  
B. Seggos, NYSDEC  
J. Drabicki, NYSDEC  
K. Petronis, NYSDEC  
R. Davies, NYSDEC  
R. Young, NYSDEC  
J. Zalewski, NYSDEC  
NYSAPA Board  
R. Weber, NYSDEC



## New York State Snowmobile Association

P.O.Box 740

Central Square, NY 13036.

Tel: (888) 624-3849 Fax (888) 317-2441

Email: [dominic@nysnowmobiler.com](mailto:dominic@nysnowmobiler.com)

[www.nysnowmobiler.com](http://www.nysnowmobiler.com)

**Executive Director**

**Dominic Jacangelo**

November 19, 2020



Ms. Cait Schadock  
NEPA Coordinator  
Directorate of Public Works  
4896 Jones Street  
Fort Drum, NY 13602-5097

Dear Ms. Schadock:

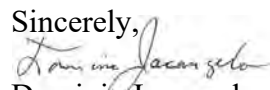
The New York State Snowmobile Association (NYSSA) is the largest snowmobile association in North America and serves as the umbrella organization for the 220 snowmobile clubs who build and maintain snowmobile trails in New York State. Our Association is proud to support the mission of Fort Drum and in fact names the Fort Drum USO as one of the organizations we contribute to each year.

We recently had the opportunity to review the environmental assessment which has been developed for the purpose of meeting the requirements of NEPA as it relates to the proposed Fort Drum 10<sup>th</sup> Combat Aviation Brigade and 10<sup>th</sup> Sustainment Brigade Mission and Training Activities. The document identifies a nine county action area for consideration. The Tug Hill area in Lewis County, the western Adirondacks including Old Forge and St. Lawrence County are the biggest destination areas in New York State for snowmobiling.

NYSSA believes the environmental assessment fails to identify a major recreational resource contained within that nine county action area. Within that area snowmobile clubs and municipalities build and maintain 3,298 miles of snowmobile trail on public and private land. You can visit <https://webapps2.cgis-solutions.com/nysnowmobile/> to see exactly where these trails are located.

It is our request that as individual sites are identified and considered for the training exercises as noted in the assessment, every effort would be made to avoid direct conflict with established snowmobile trails from mid-December to approximately April 15<sup>th</sup> when conditions put thousands of snowmobilers on this trail network each day.

We are confident that with some advance thought the 10<sup>th</sup> Brigade will be able to accomplish their training with no impacts on our recreational activity that contributes to the winter economy of the action area. Please feel free to contact me if you have additional questions.

Sincerely,  
  
Dominic Jacangelo

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## **Fort Drum Correspondence – Ad Hoc Committee Invitations**

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DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

IMDR-ZA

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Request for Participation on Off-Post Large Mission Training Ad Hoc Committee (OPT Ad Hoc Committee)

1. References:

a. U.S. Army 2020, Draft Programmatic Environmental Assessment (PEA) for Fort Drum 10th Combat Aviation Brigade and 10th Sustainment Brigade Mission and Training Activities, Fort Drum, New York. Prepared for Fort Drum Army Garrison by the Corps of Engineers. Contract W912DR-18-D0007/DO W912DR-19-F0625 with SIA-TPMC, LLC. Houston, Texas (Enclosed).

b. 32 Code of Federal Regulations (CFR) Part 651, Environmental Analysis of Army Actions; Final Rule. March 20, 2002.

2. Fort Drum Directorate of Public Works Environmental Division is working to complete the PEA, ref. 1.a., which addresses criteria for locations that meet the Army's requirement for training in a nine county local flying area. Numerous comments have been received from our North Country neighbors that we are currently reviewing with our contractor and updating the document. One recurring theme is to set up a committee to assist with siting future off-post training locations. Fort Drum whole heartedly agrees with this approach and found it very effective when we developed our Maneuver License to conduct high altitude helicopter flight training at Whiteface Mountain in 2010 and still utilize today.

3. The documentation was written at the programmatic level to get a sense from our neighbors in the local flying area what their concerns would be if we increased high intensity training events off the installation. Without that larger perspective and input it is very difficult to determine what the site specific impacts may be. The PEA is meant to build the framework and criteria to assess the impacts on individual sites when selected. Our goal, as with all Army actions, is to get to the level of no significant impact to the environment and our local communities.

4. As we continue to move forward thru the environmental assessment process we request that you to become a member of an ad hoc committee to assist with developing coordination and site selection procedures that will meet the Army's requirements and allow us to complete a Finding of No Significant Impact for these operations and complete the PEA process. This committee would consider and develop coordination procedures for locating, establishing, using and restoring potential training locations in

IMDR-ZA

SUBJECT: Request for Participation on Off-Post Large Mission Training Ad Hoc Committee (OPT Ad Hoc Committee)

the nine county flying area, and discuss types of land use agreements appropriate for future off-post training missions.

5. Please provide contact information to Ms. Cait Schadock, NEPA Coordinator at cathryn.e.schadock.civ@mail.mil to confirm your participation. Cait will be gathering the list of attendees emails in the coming weeks to coordinate an October informational meeting, on where we are with the document and how we can proceed together to continue to keep the Army training effectively to protect the security of nation.

Encl



JEFFERY P. LUCAS  
Colonel, AG  
Garrison Commander

DISTRIBUTION :

Commander, 10th Combat Aviation Brigade  
Commander, 10th Sustainment Brigade  
Commander, 42nd Combat Aviation Brigade  
Commander, 174th Attack Wing  
Director, DPTMS  
G-3  
G-3 Air OIC  
G-3 Training

CF :

Director, DPW  
Environmental Division Chief, DPW



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

David Stilwell  
US Fish and Wildlife Service  
New York Field Office  
3817 Luker Road  
Cortland, New York 13045

Dear Mr. Stilwell:

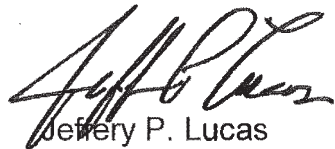
Thank you for your review of the Programmatic Environmental Assessment (PEA) for Fort Drum 10th Combat Aviation Brigade and 10th Sustainment Brigade Mission and Training Activities. We have received numerous comments from our North Country Neighbors that we are currently addressing with our contractor and updating the document. One recurring theme is utilizing a committee to assist with siting future off-post training locations. Fort Drum whole heartedly agrees with this approach and found it very effective when we developed our Maneuver License to conduct high altitude helicopter flight training at Whiteface Mountain in 2010 and still utilize today.

It was our intention to start the documentation of this action at the programmatic level to get a sense from our neighbors in the local flying area what their concerns would be if we increased high intensity training events off the installation. Without that larger perspective and input it is very difficult to determine what the site specific impacts may be. The PEA is meant to build the framework and criteria to assess the impacts on individual sites when selected. Our goal, as with all Army actions, is to get to the level of no significant impact to the environment and our local communities.

As we continue to move forward thru the NEPA process we invite you to become a member of an ad hoc committee to assist with selecting locations that meet the Army's requirements and will allow us to complete a Finding of No Significant Impact for these operations. This committee would consider and develop coordination procedures for locating, establishing, using and restoring potential training locations in the nine county flying area, and discuss types of land use agreements appropriate for future off-post training missions.

Please reach out to my action officer Ms. Cait Schadock our NEPA Coordinator at [cathryn.e.schadock.civ@mail.mil](mailto:cathryn.e.schadock.civ@mail.mil) if you are interested in having a seat on this committee. She will be gathering the list of attendees emails in the coming weeks to coordinate an early October informational meeting, on where we are with the document and how we can proceed together to continue to keep the Army training effectively to protect the security of the nation.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff P. Lucas". The signature is stylized with a large, sweeping "J" and "L".

Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Basil Seggos, Commissioner  
New York State Department of  
Environmental Conservation  
625 Broadway  
Albany, NY 12233-0001

Dear Mr. Seggos:

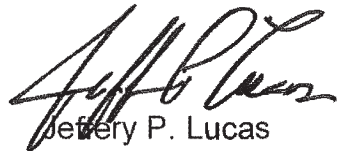
Fort Drum is currently completing a Programmatic Environmental Assessment (PEA) for Fort Drum 10th Combat Aviation Brigade and 10th Sustainment Brigade Mission and Training Activities which will select locations that meet the Army's requirement for training in a nine county local flying area. We have received numerous comments from our North Country Neighbors that we are currently addressing with our contractor and updating the document. One recurring theme is utilizing a committee to assist with siting future off-post training locations. Fort Drum whole heartedly agrees with this approach and found it very effective when we developed our Maneuver License to conduct high altitude helicopter flight training at Whiteface Mountain in 2010 and still utilize today.

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Sincerely,

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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander



**DEPARTMENT OF THE ARMY**  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Joseph Zalewski, Acting Regional Director  
New York State Department of  
Environmental Conservation Region #5  
1115 NYS Rt. 86, P.O. Box 296  
Ray Brook, NY 12977-0296

Dear Mr. Zalewski:

Thank you for your review of the Programmatic Environmental Assessment (PEA) for Fort Drum 10th Combat Aviation Brigade and 10th Sustainment Brigade Mission and Training Activities. We have received numerous comments from our North Country Neighbors that we are currently addressing with our contractor and updating the document. One recurring theme is utilizing a committee to assist with siting future off-post training locations. Fort Drum whole heartedly agrees with this approach and found it very effective when we developed our Maneuver License to conduct high altitude helicopter flight training at Whiteface Mountain in 2010 and still utilize today.

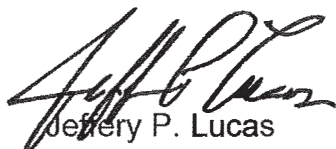
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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Randall Young, Director  
New York State Department of  
Environmental Conservation Region #6  
317 Washington St.  
Watertown, NY 13601-3787

Dear Mr. Young:

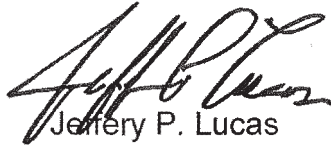
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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Matthew Marko, Regional Director  
New York State Department of  
Environmental Conservation Region #7  
615 Erie Blvd. West  
Syracuse, NY 13204-2400

Dear Mr. Marko:

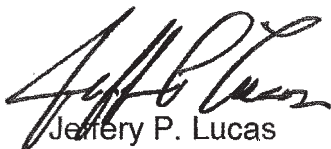
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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander



DEPARTMENT OF THE ARMY  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Dr. Nancy Herter  
New York State Historic Preservation Office  
Peebles Island Resource Center  
P.O. Box 189  
Waterford, NY 12188-0189

Dear Dr. Herter:

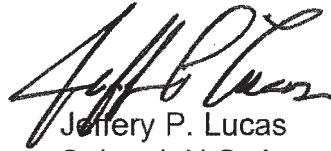
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Jeffery P. Lucas  
Colonel, U.S. Army  
Garrison Commander





**DEPARTMENT OF THE ARMY**  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

**SEP 25 2020**

Office of the Garrison Commander

Richard E. Weber, Deputy Director - Planning  
Adirondack Park Agency  
PO Box 99  
1133 NYS Route 86  
Ray Brook, NY 12977

Dear Mr. Weber:

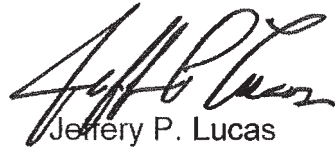
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Colonel, U.S. Army  
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US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT DRUM  
10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Mr. Jesse Bergevin  
Historic Resources Specialist  
The Oneida Indian Nation  
2037 Dream Catcher Plaza  
Oneida, NY 13421-0662

Dear Mr. Bergevin:

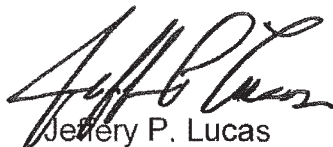
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10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Mr. Tony Gonyea, Faithkeeper  
The Onondaga Nation  
Administration Building  
4040 Route 11  
Onondaga Nation  
Nedrow, NY 13120

Dear Faithkeeper Gonyea:

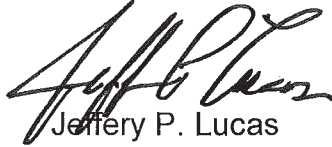
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10000 10TH MOUNTAIN DIVISION DRIVE  
FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Mr. Darren Bonaparte  
St. Regis Mohawk Tribe  
Tribal Historic Preservation Office  
71 Margaret Terrance Memorial Way  
Akwesasne, NY 13655

Dear Mr. Bonaparte:

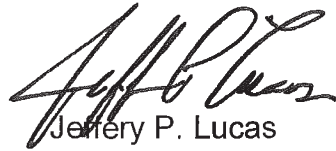
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FORT DRUM, NEW YORK 13602-5046

SEP 25 2020

Office of the Garrison Commander

Michael Pratt, President and CEO  
Olympic Regional Development Authority  
2634 Main St,  
Lake Placid, NY 12946

Dear Mr. Pratt:

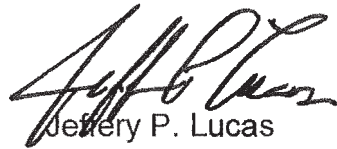
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Colonel, U.S. Army  
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SEP 25 2020

Office of the Garrison Commander

John Sheehan, Director of Communications  
Adirondack Council  
342 Hamilton Street  
Albany, NY 12210

Dear Mr. Sheehan:

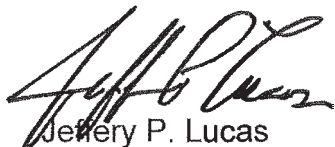
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SEP 25 2020

Office of the Garrison Commander

Michael Barrett, Executive Director  
Adirondack Mountain Club  
301 Hamilton Street  
Albany, NY 12210-1707

Dear Mr. Barrett:

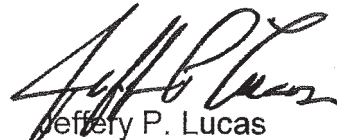
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SEP 25 2020

Office of the Garrison Commander

David H. Gibson, Managing Partner  
Adirondack Wild: Friends of the Forest Preserve  
PO Box 9247  
Niskayuna, NY 12309

Dear Mr. Gibson:

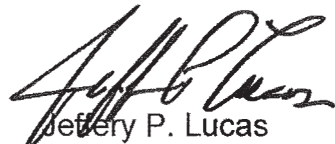
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Colonel, U.S. Army  
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**Appendix B**  
**State Listed Species**

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## State Listed Species

Species that are designated as threatened or endangered under ESA are assigned the same status at the state level in New York. Therefore, federally listed species shown in Table 3-8 are not included in Table B-1 but are also state-listed species.

**Table B-1. State Listed Species in the Action Area**

Common Name	Scientific Name	State Status	Occurrence in the Action Area (by County)
<b>Birds</b>			
American Bittern	<i>Botaurus lentiginosus</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Threatened	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Bicknell's Thrush	<i>Catharus bicknelli</i>	Species of Special Concern	Essex, Hamilton
Cerulean Warbler	<i>Setophaga cerulea</i>	Species of Special Concern	Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Common Loon	<i>Gavia immer</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Common Nighthawk	<i>Chordeiles minor</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Common Tern	<i>Sterna hirundo</i>	Threatened	Essex, Jefferson, Oneida, Onondaga, Oswego, St. Lawrence
Cooper's Hawk	<i>Accipiter cooperii</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Golden Eagle	<i>Aquila chrysaetos</i>	Endangered	Essex, Hamilton, Herkimer, St. Lawrence
Golden-winged Warbler	<i>Vermivora chrysoptera</i>	Species of Special Concern	Essex, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence



Common Name	Scientific Name	State Status	Occurrence in the Action Area (by County)
Grasshopper Sparrow	<i>Ammodramus savannarum</i>	Species of Special Concern	Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Henslow's Sparrow	<i>Ammodramus henslowii</i>	Threatened	Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Horned Lark	<i>Eremophila alpestris</i>	Species of Special Concern	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
King Rail	<i>Rallus elegans</i>	Threatened	Essex, Oswego
Least Bittern	<i>Ixobrychus exilis</i>	Threatened	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Loggerhead Shrike	<i>Lanius ludovicianus</i>	Endangered	Jefferson, Lewis, Oneida, Oswego, St. Lawrence
Northern Goshawk	<i>Accipiter gentilis</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Northern Harrier	<i>Circus hudsonius</i>	Threatened	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Osprey	<i>Pandion haliaetus</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Peregrine Falcon	<i>Falco peregrinus</i>	Endangered	Essex, Hamilton, Herkimer, Jefferson, Oneida, Onondaga, Oswego, St. Lawrence
Pied-billed Grebe	<i>Podilymbus podiceps</i>	Threatened	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Red-headed Woodpecker	<i>Melanerpes erythrocephalus</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson,

Common Name	Scientific Name	State Status	Occurrence in the Action Area (by County)
			Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Red-shouldered Hawk	<i>Buteo lineatus</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Sedge Wren	<i>Cistothorus platensis</i>	Threatened	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Sharp-shinned Hawk	<i>Accipiter striatus</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Short-eared Owl	<i>Asio flammeus</i>	Endangered	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, St. Lawrence
Spruce Grouse	<i>Falcapennis canadensis</i>	Endangered	Essex, Hamilton, St. Lawrence
Upland Sandpiper	<i>Bartramia longicauda</i>	Threatened	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Vesper Sparrow	<i>Pooecetes gramineus</i>	Species of Special Concern	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Whip-poor-will	<i>Antrostomus vociferus</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Yellow-breasted Chat	<i>Icteria virens</i>	Species of Special Concern	Jefferson, Oneida, Onondaga, St. Lawrence
<b>Mammals</b>			
Eastern Small-footed Myotis	<i>Myotis leibii</i>	Species of Special Concern	Essex, Hamilton, Jefferson, Onondaga, St. Lawrence
<b>Reptiles</b>			
Blanding's Turtle	<i>Emydoidea blandingii</i>	Threatened	Hamilton, Jefferson, Lewis, Oneida,



Common Name	Scientific Name	State Status	Occurrence in the Action Area (by County)
			Onondaga, Oswego, St. Lawrence
Eastern Box Turtle	<i>Terrapene carolina</i>	Species of Special Concern	Oswego
Eastern Hog-nosed Snake	<i>Heterodon platirhinos</i>	Species of Special Concern	Onondaga
Spiny Softshell	<i>Apalone spinifera</i>	Species of Special Concern	Essex, Jefferson, Oneida, Oswego
Spotted Turtle	<i>Clemmys guttata</i>	Species of Special Concern	Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Timber Rattlesnake	<i>Crotalus horridus</i>	Threatened	Essex
Wood Turtle	<i>Glyptemys insculpta</i>	Species of Special Concern	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
<b>Amphibians</b>			
Blue-spotted Salamander	<i>Ambystoma laterale</i>	Species of Special Concern	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Jefferson Salamander	<i>Ambystoma jeffersonianum</i>	Species of Special Concern	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, St. Lawrence
<b>Fish</b>			
Eastern Sand Darter	<i>Ammocrypta pellucida</i>	Threatened	Essex, St. Lawrence
Lake Chubsucker	<i>Erimyzon sucetta</i>	Threatened	Oneida, Onondaga, Oswego
Lake Sturgeon	<i>Acipenser fulvescens</i>	Threatened	Essex, Jefferson, Oneida, Onondaga, Oswego, St. Lawrence
Mooneye	<i>Hiodon tergisus</i>	Threatened	Essex, Jefferson, Oswego, St. Lawrence
Northern Sunfish	<i>Lepomis peltastes</i>	Threatened	Onondaga, Oswego
Pugnose Shiner	<i>Notropis anogenus</i>	Endangered	Jefferson, St. Lawrence
Round Whitefish	<i>Prosopium cylindraceum</i>	Endangered	Essex, Hamilton, Herkimer, Lewis, Oswego, St. Lawrence
Spoonhead Sculpin	<i>Cottus ricei</i>	Endangered	Oswego
<b>Insects</b>			
Bogbean Buckmoth	<i>Hemileuca</i> sp.	Endangered	Oswego
Common Sanddragon	<i>Progomphus obscurus</i>	Species of Special Concern	Essex
Extra-striped Snaketail	<i>Ophiogomphus anomalus</i>	Species of Special Concern	Essex, Herkimer, Oneida, St. Lawrence



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Frosted Elfin	<i>Callophrys irus</i>	Threatened	Oneida
Gray Petaltail	<i>Tachopteryx thoreyi</i>	Species of Special Concern	Lewis
Karner Blue	<i>Plebejus melissa samuelis</i>	Endangered	Jefferson, Oneida
Olympia Marble	<i>Euchloe olympia</i>	Species of Special Concern	Jefferson
Tawny Crescent	<i>Phyciodes batesii batesii</i>	Species of Special Concern	Onondaga
Tomah Mayfly	<i>Siphonisca aerodromia</i>	Endangered	Jefferson, Lewis
<b>Snails</b>			
Mossy Valvata	<i>Valvata sincera</i>	Species of Special Concern	Onondaga, Oswego
<b>Plants</b>			
Alpine Azalea	<i>Kalmia procumbens</i>	Endangered	Essex
Alpine Cliff Fern	<i>Woodsia alpina</i>	Endangered	Essex
Alpine Goldenrod	<i>Solidago leiocarpa</i>	Threatened	Essex
Alpine Sweetgrass	<i>Anthoxanthum monticola</i> ssp. <i>monticola</i>	Endangered	Essex
Alpine Willow-herb	<i>Epilobium hornemannii</i> ssp. <i>hornemannii</i>	Endangered	Essex, Herkimer, Jefferson, St. Lawrence
Alternate-flowered Water Milfoil	<i>Myriophyllum alterniflorum</i>	Threatened	Essex, Jefferson, St. Lawrence
Ambiguous Sedge	<i>Carex amphibola</i>	Endangered	Oneida
American Dragonhead	<i>Dracocephalum parviflorum</i>	Endangered	Jefferson, Lewis, Oneida, St. Lawrence
American Shore Grass	<i>Littorella americana</i>	Endangered	Hamilton
American Waterwort	<i>Elatine americana</i>	Endangered	Oneida
Angled Spike Rush	<i>Eleocharis quadrangulata</i>	Endangered	Oneida, Onondaga, Oswego
Annual Saltmarsh Aster	<i>Symphyotrichum subulatum</i> var. <i>subulatum</i>	Threatened	Onondaga
Arctic Rush	<i>Oreojuncus trifidus</i>	Threatened	Essex
Auricled Twayblade	<i>Neottia auriculata</i>	Endangered	Lewis
Autumnal Water-starwort	<i>Callitriche hermaphroditica</i>	Endangered	Jefferson, Lewis, St. Lawrence
Back's Sedge	<i>Carex backii</i>	Threatened	Essex, Hamilton, Jefferson, St. Lawrence
Bearberry Willow	<i>Salix uva-ursi</i>	Threatened	Essex
Bear's Foot	<i>Smallanthus uvedalia</i>	Endangered	Onondaga
Big Shellbark Hickory	<i>Carya laciniosa</i>	Threatened	Oneida, Onondaga
Bigelow's Sedge	<i>Carex bigelowii</i> ssp. <i>bigelowii</i>	Threatened	Essex



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Bigleaf Yellow Avenas	<i>Geum macrophyllum</i> var. <i>macrophyllum</i>	Endangered	Essex
Bird's Eye Primrose	<i>Primula mistassinica</i>	Threatened	Jefferson, Lewis, Oneida, Oswego
Black Sedge	<i>Carex nigra</i>	Endangered	Oneida
Blue-eyed-Mary	<i>Collinsia verna</i>	Endangered	Herkimer, Oneida
Blunt-lobed Grape Fern	<i>Botrychium oneidense</i>	Threatened	Essex, Herkimer, Lewis, Oneida, Onondaga, St. Lawrence
Boott's Rattlesnake Root	<i>Nabalus boottii</i>	Endangered	Essex
Bristly Nodding Sedge	<i>Carex echinodes</i>	Endangered	Jefferson, St. Lawrence
Broad-lipped Twayblade	<i>Neottia convallarioides</i>	Endangered	Essex, Hamilton, Herkimer, Jefferson, Lewis, Oneida, Onondaga
Brown Bog Sedge	<i>Carex buxbaumii</i>	Threatened	Essex, Herkimer, Lewis, Oneida, Onondaga, St. Lawrence
Button Sedge	<i>Carex bullata</i>	Endangered	Oneida
Buttonbush Dodder	<i>Cuscuta cephalanthi</i>	Endangered	Onondaga
Calypso	<i>Calypso bulbosa</i> var. <i>americana</i>	Endangered	Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Canada Rice Grass	<i>Piptatheropsis canadensis</i>	Threatened	Essex, St. Lawrence
Canadian Single-spike Sedge	<i>Carex scirpoidea</i> ssp. <i>scirpoidea</i>	Endangered	Essex
Carey's Sedge	<i>Carex careyana</i>	Endangered	Jefferson, Onondaga, St. Lawrence
Carey's Smartweed	<i>Persicaria careyi</i>	Endangered	Herkimer, Onondaga, Oswego
Carolina Whitlow Grass	<i>Tomostima reptans</i>	Threatened	Jefferson
Catfoot	<i>Pseudognaphalium micradenium</i>	Endangered	Oneida
Cat-tail Sedge	<i>Carex typhina</i>	Endangered	Essex, Oneida
Climbing Fern	<i>Lygodium palmatum</i>	Endangered	Oneida, Onondaga
Clinton's Club Sedge	<i>Trichophorum clintonii</i>	Endangered	Hamilton, Lewis, St. Lawrence
Cloud Sedge	<i>Carex haydenii</i>	Endangered	Essex, Hamilton, Herkimer, Jefferson, Lewis, Onondaga, St. Lawrence



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Clustered Sedge	<i>Carex cumulata</i>	Threatened	Essex, Oneida
Common Moonwort	<i>Botrychium neolumaria</i>	Endangered	Oneida, Onondaga
Cork Elm	<i>Ulmus thomasi</i>	Threatened	Herkimer, Jefferson, Lewis, Oneida, Onondaga, St. Lawrence
Crane-fly Orchid	<i>Tipularia discolor</i>	Endangered	Onondaga
Crawe's Sedge	<i>Carex crawei</i>	Threatened	Herkimer, Jefferson, Oneida, St. Lawrence
Creeping Juniper	<i>Juniperus horizontalis</i>	Endangered	Oneida, Onondaga
Creeping Sedge	<i>Carex chordorrhiza</i>	Threatened	Herkimer, Jefferson, Lewis, Oneida, Oswego, St. Lawrence
Culver's Root	<i>Veronicastrum virginicum</i>	Threatened	Herkimer, Oswego
Cypress-knee Sedge	<i>Carex decomposita</i>	Endangered	Oneida
Daisy Fleabane	<i>Erigeron hyssopifolius</i>	Endangered	Essex, Hamilton
Davis' Sedge	<i>Carex davisii</i>	Threatened	Oneida
Deer's Hair Sedge	<i>Trichophorum cespitosum</i> ssp. <i>cespitosum</i>	Threatened	Essex
Diapensia	<i>Diapensia lapponica</i>	Threatened	Essex
Douglas' Knotweed	<i>Polygonum douglasii</i>	Threatened	Essex, Jefferson, St. Lawrence
Downy Lettuce	<i>Lactuca hirsuta</i>	Endangered	Essex, Oneida, St. Lawrence
Downy Phlox	<i>Phlox pilosa</i> ssp. <i>pilosa</i>	Endangered	St. Lawrence
Downy Wood Mint	<i>Blephilia ciliata</i>	Endangered	Essex
Dragon's Mouth Orchid	<i>Arethusa bulbosa</i>	Threatened	Essex, Hamilton, Jefferson, Lewis, Oneida, Onondaga, Oswego, St. Lawrence
Drummond's Rock Cress	<i>Boechera stricta</i>	Threatened	Essex, Jefferson, Onondaga, St. Lawrence
Dwarf Bilberry	<i>Vaccinium cespitosum</i>	Endangered	Essex, Oneida
Dwarf Bulrush	<i>Cyperus subsquarrosus</i>	Endangered	Essex, Oneida, Oswego
Dwarf Cherry	<i>Prunus pumila</i> var. <i>depressa</i>	Threatened	Essex, Hamilton, Jefferson, Lewis, Oneida
Dwarf White Birch	<i>Betula minor</i>	Endangered	Essex, St. Lawrence
Dwarf Willow	<i>Salix herbacea</i>	Endangered	Essex
Eastern Prairie Fringed Orchid	<i>Platanthera leucophaea</i>	Endangered	Onondaga
Elk Sedge	<i>Carex garberi</i>	Endangered	Jefferson
Emory's Sedge	<i>Carex emoryi</i>	Endangered	St. Lawrence
Fairywand	<i>Chamaelirium luteum</i>	Endangered	Onondaga



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False Hop Sedge	<i>Carex lupuliformis</i>	Threatened	Essex, Jefferson, Lewis, Oneida, Oswego
False Toadflax	<i>Geocaulon lividum</i>	Endangered	Essex
Farwell's Water Milfoil	<i>Myriophyllum farwellii</i>	Threatened	Essex, Hamilton, Herkimer, Oneida, Onondaga, St. Lawrence
Featherfoil	<i>Hottonia inflata</i>	Threatened	Jefferson
Fernald's Blue Grass	<i>Poa laxa</i> ssp. <i>fernaldiana</i>	Endangered	Essex
Fernald's Sedge	<i>Carex merritt-fernaldii</i>	Threatened	Essex, Jefferson, St. Lawrence
Field Dodder	<i>Cuscuta campestris</i>	Endangered	Onondaga
Fir Clubmoss	<i>Huperzia selago</i>	Endangered	Essex, St. Lawrence
Forest Blue Grass	<i>Poa sylvestris</i>	Endangered	Jefferson, Onondaga
Fragrant Cliff Fern	<i>Dryopteris fragrans</i>	Endangered	Essex, Hamilton, St. Lawrence
Frank's Sedge	<i>Carex frankii</i>	Endangered	Oneida
Georgia Bulrush	<i>Scirpus georgianus</i>	Endangered	Essex, Oswego
Glaucous Blue Grass	<i>Poa glauca</i> ssp. <i>glauca</i>	Endangered	Essex
Glomerate Sedge	<i>Carex aggregata</i>	Endangered	Jefferson, Oneida, Onondaga
Golden Corydalis	<i>Corydalis aurea</i> ssp. <i>aurea</i>	Threatened	Essex, Jefferson, Lewis
Golden Puccoon	<i>Lithospermum croceum</i>	Endangered	Onondaga
Goldenseal	<i>Hydrastis canadensis</i>	Threatened	Herkimer, Oneida, Onondaga
Goldie's Starwort	<i>Stellaria longipes</i> ssp. <i>longipes</i>	Threatened	Jefferson
Goosefoot Corn Salad	<i>Valerianella chenopodiifolia</i>	Endangered	Oneida, Onondaga
Great Lakes Sand Cherry	<i>Prunus pumila</i> var. <i>pumila</i>	Endangered	Hamilton, Jefferson, Oswego
Great Plains Flatsedge	<i>Cyperus lupulinus</i> ssp. <i>lupulinus</i>	Threatened	Oneida, Onondaga, Oswego
Green Gentian	<i>Frasera caroliniensis</i>	Threatened	Oneida
Green Rock Cress	<i>Borodinia missouriensis</i>	Threatened	Essex
Green Spleenwort	<i>Asplenium viride</i>	Endangered	Lewis
Hair-like Sedge	<i>Carex capillaris</i>	Endangered	Essex, Hamilton, Onondaga
Handsome Sedge	<i>Carex formosa</i>	Threatened	Essex, Oneida, St. Lawrence
Heart Sorrel	<i>Rumex hastatulus</i>	Endangered	Onondaga, St. Lawrence
Hidden Spike Moss	<i>Selaginella eclipses</i>	Endangered	St. Lawrence



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Hill's Pondweed	<i>Potamogeton hillii</i>	Threatened	Essex, Jefferson, Lewis, St. Lawrence
Hooker's Orchid	<i>Platanthera hookeri</i>	Endangered	Essex, Oneida, Onondaga, Oswego, St. Lawrence
Houghton's Sedge	<i>Carex houghtoniana</i>	Threatened	Essex, Hamilton, Jefferson, Oneida, Oswego, St. Lawrence
Interior Blue Grass	<i>Poa interior</i>	Endangered	Essex
James' Sedge	<i>Carex jamesii</i>	Threatened	Jefferson, Onondaga
Kentucky Coffee Tree	<i>Gymnocladus dioicus</i>	Endangered	Jefferson, Oneida, Onondaga
Knotted Spike Rush	<i>Eleocharis equisetoides</i>	Threatened	Oneida, Onondaga
Lake Cress	<i>Rorippa aquatica</i>	Threatened	Essex, Hamilton, Herkimer, Jefferson, Oneida, Onondaga, Oswego, St. Lawrence
Lanceleaf Arnica	<i>Arnica lanceolata</i> ssp. <i>lanceolata</i>	Endangered	Essex
Lapland Rosebay	<i>Rhododendron lapponicum</i>	Endangered	Essex
Large Twayblade	<i>Liparis liliifolia</i>	Endangered	Oneida, Onondaga, Oswego
Lesser Fringed Gentian	<i>Gentianopsis virgata</i> ssp. <i>virgata</i>	Endangered	St. Lawrence
Lindley's Aster	<i>Symphyotrichum ciliolatum</i>	Endangered	Jefferson, Onondaga, St. Lawrence
Little-leaf Tick Trefoil	<i>Desmodium ciliare</i>	Threatened	Oneida, Onondaga, Oswego
Livid Sedge	<i>Carex livida</i>	Endangered	Essex, Herkimer, Jefferson, Oneida, Oswego, St. Lawrence
Lowland Yellow Loosestrife	<i>Lysimachia hybrida</i>	Endangered	Essex, Oneida
Many-headed Sedge	<i>Carex sychnocephala</i>	Endangered	Herkimer, Jefferson, Oneida
Mare's Tail	<i>Hippuris vulgaris</i>	Endangered	Essex, Lewis, St. Lawrence
Marsh Arrow Grass	<i>Triglochin palustris</i>	Threatened	Herkimer, Oneida, Onondaga
Marsh Horsetail	<i>Equisetum palustre</i>	Threatened	Herkimer, Jefferson, Lewis, Oneida, Oswego, St. Lawrence
Marsh Valerian	<i>Valeriana uliginosa</i>	Endangered	Herkimer, Lewis, Oneida, Onondaga
Meadow Horsetail	<i>Equisetum pratense</i>	Threatened	Essex, Oneida, St. Lawrence



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Mead's Sedge	<i>Carex meadii</i>	Endangered	Herkimer
Melic Oats	<i>Graphephorum melicoides</i>	Endangered	Essex, Hamilton
Michigan Lily	<i>Lilium michiganense</i>	Endangered	Jefferson, Onondaga, St. Lawrence
Midland Sedge	<i>Carex mesochorea</i>	Threatened	Onondaga
Mingan Moonwort	<i>Botrychium minganense</i>	Endangered	Oneida, Onondaga
Minute Duckweed	<i>Lemna perpusilla</i>	Endangered	Oswego
Mitchell's Sedge	<i>Carex mitchelliana</i>	Endangered	Oneida
Moor Rush	<i>Juncus stygius</i> var. <i>americanus</i>	Endangered	Essex, Herkimer, Jefferson
Mountain Death Camas	<i>Anticlea elegans</i> var. <i>glauca</i>	Threatened	Jefferson, Onondaga, St. Lawrence
Navel Corn Salad	<i>Valerianella umbilicata</i>	Endangered	Oneida
New England Northern Reed Grass	<i>Calamagrostis stricta</i> ssp. <i>inexpansa</i>	Threatened	Essex, Hamilton, Herkimer, St. Lawrence
Nodding Pogonia	<i>Triphora trianthophoros</i> ssp. <i>trianthophoros</i>	Threatened	Oneida, Onondaga
Northern Bentgrass	<i>Agrostis mertensii</i>	Threatened	Essex
Northern Bog Aster	<i>Symphyotrichum boreale</i>	Threatened	Essex, Herkimer, Jefferson, Lewis, Onondaga, Oswego, St. Lawrence
Northern Bog Sedge	<i>Carex gynocrates</i>	Endangered	Herkimer, Lewis, Oswego, St. Lawrence
Northern Bog Violet	<i>Viola nephrophylla</i>	Endangered	Essex, Hamilton, Herkimer, Jefferson, Oneida, Onondaga, St. Lawrence
Northern Bristly Club Moss	<i>Spinulum canadense</i>	Endangered	Essex, St. Lawrence
Northern Clustered Sedge	<i>Carex arcta</i>	Endangered	Essex, Herkimer, St. Lawrence
Northern Lowbush Blueberry	<i>Vaccinium boreale</i>	Threatened	Essex, Hamilton
Northern Quillwort	<i>Isoetes septentrionalis</i>	Endangered	Essex, St. Lawrence
Northern Running-pine	<i>Diphasiastrum complanatum</i>	Endangered	Essex, Lewis, Oneida, St. Lawrence
Northern Stickseed	<i>Hackelia deflexa</i> ssp. <i>americana</i>	Endangered	Jefferson
Northern Tansy-mustard	<i>Descurainia pinnata</i> ssp. <i>brachycarpa</i>	Endangered	Essex
Northern Wild Comfrey	<i>Andersonglossum boreale</i>	Endangered	Essex, Hamilton, Jefferson, Lewis, Oneida, Onondaga



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Northern Wild Licorice	<i>Galium kamtschaticum</i>	Endangered	Essex, Hamilton
Nuttall's Tick Trefoil	<i>Desmodium nuttallii</i>	Endangered	Herkimer, Onondaga
Ohio Goldenrod	<i>Solidago ohioensis</i>	Threatened	Onondaga
Orange Fringed Orchid	<i>Platanthera ciliaris</i>	Endangered	Oneida, Onondaga, Oswego
Ovate Spike Rush	<i>Eleocharis ovata</i>	Endangered	Essex, Hamilton, Herkimer, Oneida, Oswego, St. Lawrence
Pale Indian-plantain	<i>Arnoglossum atriplicifolium</i>	Endangered	Oneida
Pawpaw	<i>Asimina triloba</i>	Threatened	Oswego
Pinedrops	<i>Pterospora andromedea</i>	Endangered	Essex, Lewis, Oneida, Oswego
Pink Wintergreen	<i>Pyrola asarifolia</i> ssp. <i>asarifolia</i>	Threatened	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, St. Lawrence
Prairie Dropseed	<i>Sporobolus heterolepis</i>	Threatened	Jefferson, Lewis
Prairie Dunewort	<i>Botrychium campestre</i>	Endangered	Onondaga
Prairie Redroot	<i>Ceanothus herbaceus</i>	Endangered	Jefferson
Prairie Smoke	<i>Geum triflorum</i> var. <i>triflorum</i>	Threatened	Jefferson, Oswego
Prairie Wedge Grass	<i>Sphenopholis obtusata</i>	Endangered	Jefferson
Prickly Rose	<i>Rosa acicularis</i> ssp. <i>savi</i>	Endangered	Essex
Primrose-leaved Violet	<i>Viola primulifolia</i> var. <i>primulifolia</i>	Threatened	St. Lawrence
Purple Cress	<i>Cardamine douglassii</i>	Threatened	Essex, Onondaga
Purple Crowberry	<i>Empetrum atropurpureum</i>	Endangered	Essex
Purple Mountain Saxifrage	<i>Saxifraga oppositifolia</i> ssp. <i>oppositifolia</i>	Endangered	Hamilton
Purple Rock Cress	<i>Boechera grahamii</i>	Threatened	Essex, Jefferson, Oswego, St. Lawrence
Puttyroot	<i>Aplectrum hyemale</i>	Endangered	Essex, Jefferson, Lewis, Oneida, Onondaga, Oswego
Ram's-head Lady's Slipper	<i>Cypripedium arietinum</i>	Threatened	Essex, Herkimer, Jefferson, Lewis, Oneida, Onondaga, Oswego
Rand's Goldenrod	<i>Solidago randii</i>	Threatened	Essex, Hamilton, Herkimer
Rattlebox	<i>Crotalaria sagittalis</i>	Endangered	Lewis
Red Pigweed	<i>Oxybasis rubra</i> var. <i>rubra</i>	Threatened	Oneida, Onondaga, St. Lawrence



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Red Pondweed	<i>Potamogeton alpinus</i>	Threatened	Essex, Herkimer, Jefferson, Lewis, Oneida, Oswego, St. Lawrence
Reflexed Sedge	<i>Carex retroflexa</i>	Threatened	Hamilton, Onondaga
Rhodora	<i>Rhododendron canadense</i>	Threatened	Essex, Herkimer, Lewis, Oneida, St. Lawrence
Riverbank Goldenrod	<i>Solidago racemosa</i>	Endangered	Essex
Riverweed	<i>Podostemum ceratophyllum</i>	Threatened	Essex, Jefferson, Oneida, St. Lawrence
Rock Whitlow Grass	<i>Draba arabisans</i>	Threatened	Essex, Hamilton, Jefferson, Lewis, Oneida, Onondaga, St. Lawrence
Rough Avens	<i>Geum virginianum</i>	Threatened	Jefferson, Oneida, Onondaga, St. Lawrence
Rough Pennyroyal	<i>Hedeoma hispida</i>	Threatened	Essex, Herkimer, Jefferson, St. Lawrence
Rugulose Grape Fern	<i>Botrychium rugulosum</i>	Endangered	Essex, Hamilton, Herkimer, Oneida, Onondaga, St. Lawrence
Salt-marsh Spike Rush	<i>Eleocharis uniglumis</i>	Threatened	Jefferson, Oswego
Salt-meadow Grass	<i>Diplachne fusca</i> ssp. <i>fascicularis</i>	Endangered	Onondaga
Sand Dune Willow	<i>Salix cordata</i>	Threatened	Jefferson, Oswego, Oneida, Onondaga, St. Lawrence
Scabrous Black Sedge	<i>Carex atratiformis</i>	Endangered	Essex
Scarlet Indian-paintbrush	<i>Castilleja coccinea</i>	Endangered	Jefferson, Lewis, Onondaga, St. Lawrence
Schweinitz's Sedge	<i>Carex schweinitzii</i>	Threatened	Herkimer, Oneida, Onondaga, Oswego
Seaside Agalinis	<i>Agalinis maritima</i> var. <i>maritima</i>	Threatened	Onondaga
Seaside Bulrush	<i>Bolboschoenus maritimus</i> ssp. <i>paludosus</i>	Threatened	Onondaga
Sharp-tipped Blue-eyed Grass	<i>Sisyrinchium mucronatum</i>	Endangered	Herkimer, St. Lawrence
Sheathed Sedge	<i>Carex vaginata</i>	Endangered	Essex, Lewis
Sheep Fescue	<i>Festuca saximontana</i> var. <i>saximontana</i>	Endangered	Essex
Shining Bedstraw	<i>Galium concinnum</i>	Endangered	Onondaga



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Short's Sedge	<i>Carex shortiana</i>	Endangered	Onondaga
Shrubby St. John's Wort	<i>Hypericum prolificum</i>	Threatened	Oswego
Side-oats Grama	<i>Bouteloua curtipendula</i> var. <i>curtipendula</i>	Endangered	Jefferson
Sitka Clubmoss	<i>Diphasiastrum sitchense</i>	Endangered	Essex, St. Lawrence
Sky-blue Aster	<i>Symphyotrichum oolentangiense</i>	Endangered	Oneida, Oswego
Slender Bulrush	<i>Schoenoplectus heterochaetus</i>	Endangered	Essex, Jefferson, Oswego, St. Lawrence
Slender Marsh Blue Grass	<i>Poa paludigena</i>	Endangered	Lewis
Slender Pondweed	<i>Stuckenia filiformis</i>	Endangered	Jefferson, Oneida, Onondaga, Oswego, St. Lawrence
Small Bur-reed	<i>Sparganium natans</i>	Threatened	Essex, Hamilton, Jefferson, Lewis, Oswego, St. Lawrence
Small Floating Bladderwort	<i>Utricularia radiata</i>	Threatened	Hamilton
Small Southern Yellow Lady's Slipper	<i>Cypripedium parviflorum</i> var. <i>parviflorum</i>	Endangered	Lewis, Oneida, Onondaga, St. Lawrence
Small White Lady's Slipper	<i>Cypripedium candidum</i>	Endangered	Onondaga
Small-headed Aster	<i>Symphyotrichum lanceolatum</i> var. <i>interior</i>	Endangered	St. Lawrence
Small's Knotweed	<i>Polygonum buxiforme</i>	Endangered	Oneida, Onondaga, St. Lawrence
Smooth Beggar-ticks	<i>Bidens laevis</i>	Threatened	Jefferson, Oneida
Smooth Cliff Brake	<i>Pellaea glabella</i> ssp. <i>glabella</i>	Threatened	Essex, Jefferson, Lewis, St. Lawrence, Essex, Hamilton, Herkimer
Snowline Wintergreen	<i>Pyrola minor</i>	Endangered	Essex
Soft Fox Sedge	<i>Carex conjuncta</i>	Endangered	Herkimer, Oneida
Southern Bluets	<i>Houstonia purpurea</i> var. <i>calycosa</i>	Endangered	Essex
Southern Snailseed Pondweed	<i>Potamogeton diversifolius</i>	Endangered	Essex, Hamilton, Oneida
Southern Swamp Buttercup	<i>Ranunculus septentrionalis</i>	Endangered	St. Lawrence
Southern Twayblade	<i>Neottia bifolia</i>	Endangered	Hamilton, Lewis, Oneida, Onondaga, Oswego, St. Lawrence



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Southern Wild Raisin	<i>Viburnum nudum</i> var. <i>nudum</i>	Endangered	Onondaga
Southern Yellow Flax	<i>Linum medium</i> var. <i>texanum</i>	Threatened	St. Lawrence
Sparse-flowered Sedge	<i>Carex tenuiflora</i>	Endangered	Essex, Lewis, Oneida, Oswego, St. Lawrence
Spiked Woodrush	<i>Luzula spicata</i> ssp. <i>spicata</i>	Endangered	Essex
Spotted Pondweed	<i>Potamogeton pulcher</i>	Threatened	Oswego
Spreading Chervil	<i>Chaerophyllum procumbens</i> var. <i>procumbens</i>	Endangered	Onondaga
Spreading Rush	<i>Juncus subcaudatus</i>	Endangered	Oneida
Spurred Gentian	<i>Halenia deflexa</i> ssp. <i>deflexa</i>	Endangered	Essex, Hamilton, Herkimer, Oneida
Squashberry	<i>Viburnum edule</i>	Threatened	Essex, Herkimer
Stalked Bugleweed	<i>Lycopus rubellus</i>	Endangered	Herkimer
Stargrass	<i>Aletris farinosa</i>	Threatened	Onondaga
Sticky False Asphodel	<i>Triantha glutinosa</i>	Endangered	Onondaga
Stiff Tick Trefoil	<i>Desmodium obtusum</i>	Endangered	Onondaga, Oswego
Straight-leaved Pondweed	<i>Potamogeton strictifolius</i>	Endangered	Essex, Jefferson, Oneida, Onondaga, Oswego, St. Lawrence
Straw Sedge	<i>Carex straminea</i>	Endangered	Oswego
Striped Coralroot	<i>Corallorhiza striata</i> var. <i>striata</i>	Endangered	Jefferson, Lewis
Swamp Aster	<i>Eurybia radula</i>	Endangered	St. Lawrence
Swamp Birch	<i>Betula pumila</i>	Threatened	Essex, Lewis, St. Lawrence
Swamp Lousewort	<i>Pedicularis lanceolata</i>	Threatened	Onondaga
Swamp Oats	<i>Sphenopholis pensylvanica</i>	Endangered	Herkimer
Swamp Smartweed	<i>Persicaria setacea</i>	Endangered	Oneida, Onondaga, Oswego
Sweet Coltsfoot	<i>Petasites frigidus</i> var. <i>palmaris</i>	Endangered	Essex, Onondaga, St. Lawrence
Sweet-scented Indian Plantain	<i>Senecio suaveolens</i>	Endangered	Onondaga
Tall Bellflower	<i>Campanula americana</i>	Endangered	Onondaga
Tall Ironweed	<i>Vernonia gigantea</i>	Endangered	Herkimer, Lewis, Oneida
Terrestrial Starwort	<i>Callitriche terrestris</i>	Threatened	Essex, Herkimer, Oneida, Onondaga
Tinged Sedge	<i>Carex tinctoria</i>	Endangered	Herkimer
Toothed Rock Cress	<i>Borodinia dentata</i>	Threatened	Oneida
Tundra Dwarf Birch	<i>Betula glandulosa</i>	Endangered	Essex



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Twinleaf	<i>Jeffersonia diphylla</i>	Threatened	Jefferson, Lewis, Onondaga
Veiny Meadow Rue	<i>Thalictrum venulosum</i>	Endangered	Essex
Virginia False Gromwell	<i>Lithospermum virginianum</i>	Endangered	Oneida, Onondaga
Virginia Ground Cherry	<i>Physalis virginiana</i> var. <i>virginiana</i>	Endangered	Oneida
Virginia Three-seeded Mercury	<i>Acalypha virginica</i>	Endangered	Onondaga
Water Awlwort	<i>Subularia aquatica</i> ssp. <i>americana</i>	Endangered	Essex, Hamilton
Whip Nut Sedge	<i>Scleria triglomerata</i>	Endangered	Oneida
White Basswood	<i>Tilia americana</i> var. <i>heterophylla</i>	Endangered	Onondaga
White Mountain Saxifrage	<i>Saxifraga paniculata</i> ssp. <i>paniculata</i>	Endangered	Essex
White-edge Sedge	<i>Carex debilis</i> var. <i>debilis</i>	Threatened	Hamilton, Oneida
Whorled Mountain Mint	<i>Pycnanthemum verticillatum</i> var. <i>verticillatum</i>	Endangered	Herkimer, Oneida, St. Lawrence
Wiegand's Sedge	<i>Carex wiegandii</i>	Endangered	Lewis
Wild Pink	<i>Silene caroliniana</i> ssp. <i>pennsylvanica</i>	Threatened	Onondaga
Wild Sweet William	<i>Phlox maculata</i> ssp. <i>maculata</i>	Endangered	Essex, Hamilton, Lewis, Oneida, Onondaga
Woodland Agrimony	<i>Agrimonia rostellata</i>	Threatened	Onondaga
Woodland Cudweed	<i>Omalotheca sylvatica</i>	Endangered	Herkimer
Wright's Spike Rush	<i>Eleocharis diandra</i>	Endangered	Oneida, Oswego
Yellow Giant-hyssop	<i>Agastache nepetoides</i>	Threatened	Essex, Herkimer, Jefferson, Oneida, Onondaga, St. Lawrence
Yellow Mountain Saxifrage	<i>Saxifraga aizoides</i>	Threatened	Jefferson, Oneida, Oswego
Yellow Wild Flax	<i>Linum sulcatum</i>	Threatened	Oneida, Onondaga

Source: NYSDEC 2019

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