

24 May 2018

Ricky Silvestro
NYS DEC
182 E. Union Suite 3
Allegany, NY 14706
email: r9.ump@dec.ny.gov

RE: Draft Niagara Frontier Unit Management Plan (UMP) for state lands in Erie and Cattaraugus counties.

The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on the Draft Niagara Frontier (NF) UMP.

The Adirondack Mountain Club (ADK) is dedicated to the conservation, preservation, and responsible recreational use of the New York State Forest Preserve and other parks, wild lands, and waters vital to our members and chapters. ADK is a nonprofit organization with 30,000 members in 27 statewide chapters served by a year-round staff offering programs that help people discover, play in, and protect natural places. Since its founding in 1922, The Adirondack Mountain Club has protected wild lands and waters through the work of its dedicated member volunteers and staff. ADK members hike, camp, snowshoe, cross-country ski, paddle, and cycle on public lands across New York State.

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

On April 12, 2018, ADK Executive Director Neil Woodworth and Conservation Director attended a Department of Environmental Conservation (DEC) scoping meeting for a new Unit Management Plan (UMP) for the Zoar Vally Multiple Use Area (ZVMUA) and the Zoar Valley Unique Area (ZVUA). The meeting was well attended and most of the public comments came from landowners whose properties adjoin the Zoar Valley MUA particularly on the Cattaraugus County side of the gorge. Most of the complaints centered on litter and trespass issues particularly from groups of people that entered the ZVMUA and ZVUA in violation of the existing DEC regulation that prohibits entering the Zoar Valley Gorge from between sunset and sunrise. Neighbors testified that many of these night users came to party and drink alcoholic beverages. It was alleged that many of these partiers were underage, below the

New York State drinking age. Landowners complained that these nightly trespassers often left garbage on their private properties adjoining the ZVMUA. They often created campfires. The provision of 6NYCRR Part 190.25 prohibits the possession and use of alcoholic beverages, the creation and use of fires, and possession of glass containers. Since violators of the sunset to sunrise curfew of 190.25 must park in parking lots or roadside areas adjacent to the ZVMUA, we believe that ticketing, booting, or impounding their motor vehicles would be an effective deterrent to nightly misuse of the ZVMUA and ZVUA. We believe that periodic patrols of the ZVMUA and the ZVUA by DEC forest rangers and environmental conservation officers would be an effective deterrent to the garbage, litter, and trespass on private lands adjoining the ZVMUA and ZVUA.

ADK believes that periodic patrols by DEC forest rangers and ECO's would also educate the public on the natural dangers present in the rim areas of the Zoar Valley Gorge. DEC lands and forest staff should delineate safe hiking trails to enter the Zoar Valley Gorge from Valentine Flats parking lot and the Forty Road parking lot. DEC should also place information kiosks at both ends of the Holcomb Pond trail. These information kiosks or signage should alert hikers to the great danger of fatal falls from the top of the rim of the north side of the Zoar Valley Gorge, especially a herd path that runs along the north rim which is especially dangerous. ADK believes that use of this unmarked herd path is responsible for a number of deaths and serious injuries resulting from falls into the gorge. This herd path should be aggressively brushed in with "Danger- Do Not Proceed past this point" signing to supplement information signing at the Unger Road parking lot and the Holcomb Pond trailhead on Vail Road. We believe DEC should mark several hiking trails to safe overlooks at Point Peter with fencing and/or perhaps a viewing platform.

ADK believes that several assistant Forest Rangers should be assigned to the ZVMUA and ZVUA during the high use Memorial Day to Columbus Day period. ADK agrees with regulation 6NYCRR Part 190.25(c)(d) and (g) that any use of motor vehicles, all-terrain vehicles, snowmobiles, motorcycles, 4wd off-road vehicles, bicycles, and horses should be strictly forbidden on the lands of the ZVMUA and ZVUA except by the Department and first responders in emergency search and rescue and/or medical evacuation situations. ADK believes that under the provision of 6NYCRR Part 190.25 subdivision (e)

that target shooting and other use of any kind of firearm be prohibited on the lands of the AZMUA and ZVUA. We believe that the users of the main stream and South Fork of Cattaraugus Creek through the ZVMUA and ZVUA should be limited to non-motorized rafts, canoes, and kayaks and this prohibition should be codified as new subdivision (r) of 6NYCRR art 190.25. Subdivision (j) of 6NYCRR Part 190.25 should be amended to expressly prohibit any overnight camping in the ZVMUA and ZVUA. The lands of the ZVMUA and ZVUA have such unique character, beauty and scenic value that DEC should not conduct any timber sales or harvests on the lands of the ZVMUA and ZVUA except for emergency measures to safeguard the trees and natural resources of the area.

ADK submits that the entire lands of the ZVMUA should be managed in the same manner as the lands of the ZVUA. The ZVUA is protected as part of the state Nature and Historic Preserve Trust, under Section 4 of Article XIV of the state Constitution and as defined and regulated by Environmental Conservation Law (ECL) Section 45-0117, subdivision 3 and ECL Section 51-0703, subdivision 4. Since the lands of the ZVMUA directly adjoin the rim and gorge lands of the ZVUA, the lands of the ZVUA are best protected by managing the surrounding lands of the ZVMUA in the same manner and under the same legal restrictions as Unique area lands.

Prohibit Resource Extraction and Infrastructure

ADK asserts to DEC that there should be no expansion or renewal of any leases between the Department and National Fuel Gas, or any other entity for underground natural gas storage or extraction of natural gas on the lands of the ZVMUA and the ZVUA. The extraction and/or mining of sand, stone, or gravel should be prohibited on ZVMUA and ZVUA by amendment of 6NYCRR Part 190.25 to include a subdivision (s) to prohibit these activities.

Oil and gas drilling and mineral development creates an unacceptable impact on state lands and should be prohibited.

It is essential that DEC protect the forest ecosystems that it stewards and guard against resource extraction that harms natural habitats and human communities. DEC must not provide access through lease or other means to its mineral estate for vertical or horizontal oil and gas drilling. Given the

proximity of legacy drilling sites in the area, DEC should test water resources for contamination from drilling activity in this state forest unit.

Oil and gas pipeline construction should also be prohibited on State Forests. Any existing pipelines or infrastructure should be phased out and impacted areas should be mitigated.

We strongly urge DEC to prohibit oil and gas drilling on or under state forests lands of the ZVMUA and ZVUA.

ADK submits that DEC should purchase any and all oil, gas and mineral extraction rights from under the lands of the ZVMUA and the ZVUA. DEC should endeavor to extinguish any leases for subsurface oil, gas or mineral extraction that would detract, damage or degrade the natural resources and scenic beauty of the lands of the ZVMUA and the ZVUA.

Volunteer Stewardship Agreement

The Department should consider negotiating a Voluntary Stewardship Agreement (VSA) with the ADK Niagara Frontier Chapter for trail maintenance and litter control of the lands of the ZVMUA and the ZVUA. The Department should work with Senator Catherine Young and Assembly member Joseph Giglioto to provide additional funding to the Village of Gowanda Fire Department to purchase additional rescue equipment and reimburse this community for some of the costs and expense of the numerous search and rescues which occur in Zoar Valley Gorge. The family tragedy that occurred last year happened on the north rim with access from the Unger Road parking lot. DEC signage along the north rim of the Zoar Valley Gorge is sparse to non-existent. A popular lookout and trail called the Knife Edge Ridge with access from Unger road leads down into the gorge. It is a narrow and steep trail. It is passable by experienced hikers but very risky for novices and families with children. DEC needs to focus on the Knife Edge Ridge trail and determine what signage and warnings are appropriate both at the Unger Road parking lot and at the start of the Knife Edge Ridge path.

Develop Early Detection and Rapid Response Plans for Invasive Species.

Please develop early detection and rapid response plans for invasive species in the Niagara Frontier UMP. Invasive species are spreading at rapid rate, reducing water quality, property values, and recreational opportunities along the way. New York State has enacted numerous regulations and laws that will prove vital to stopping the spread of aquatic and terrestrial invasive species, but public education, spread prevention, and mitigation are needed before the impacts become insurmountable. The UMP should include an inventory of invasive species which are a threat to the unit, such as Hemlock Woolly Adelgid (see below).

Threat of Hemlock Woolly Adelgid. Consider Potential of Bio-Control.

Hemlock Woolly Adelgid (HWA) should be identified in the UMP as a threat. DEC should recognize that eastern hemlock, a foundation species, plays an important role in the Unit. DEC should identify mature trees and stands, coordinate monitoring, and develop a prioritization and treatment regime to protect hemlocks in this forest unit. DEC should identify and protect old growth stands, and should work with the Regional PRISMs (Western NY),¹ **the NY State Hemlock Initiative, and DEC's Bureau of Invasive Species and Ecosystem Health** to prepare for the threat of HWA in this unit. New York faces the potential decimation of eastern hemlock from HWA, which has been identified and treated in the southern part of the Zoar Valley Multiple Use Area along the south branch of Cattaraugus Creek (see figure below from <http://www.nyimapinvasives.org/>). HWA has already caused significant decline in the Catskill Park, and has been identified on other New York State Public Lands including Letchworth State Park, and Allegany State Park.

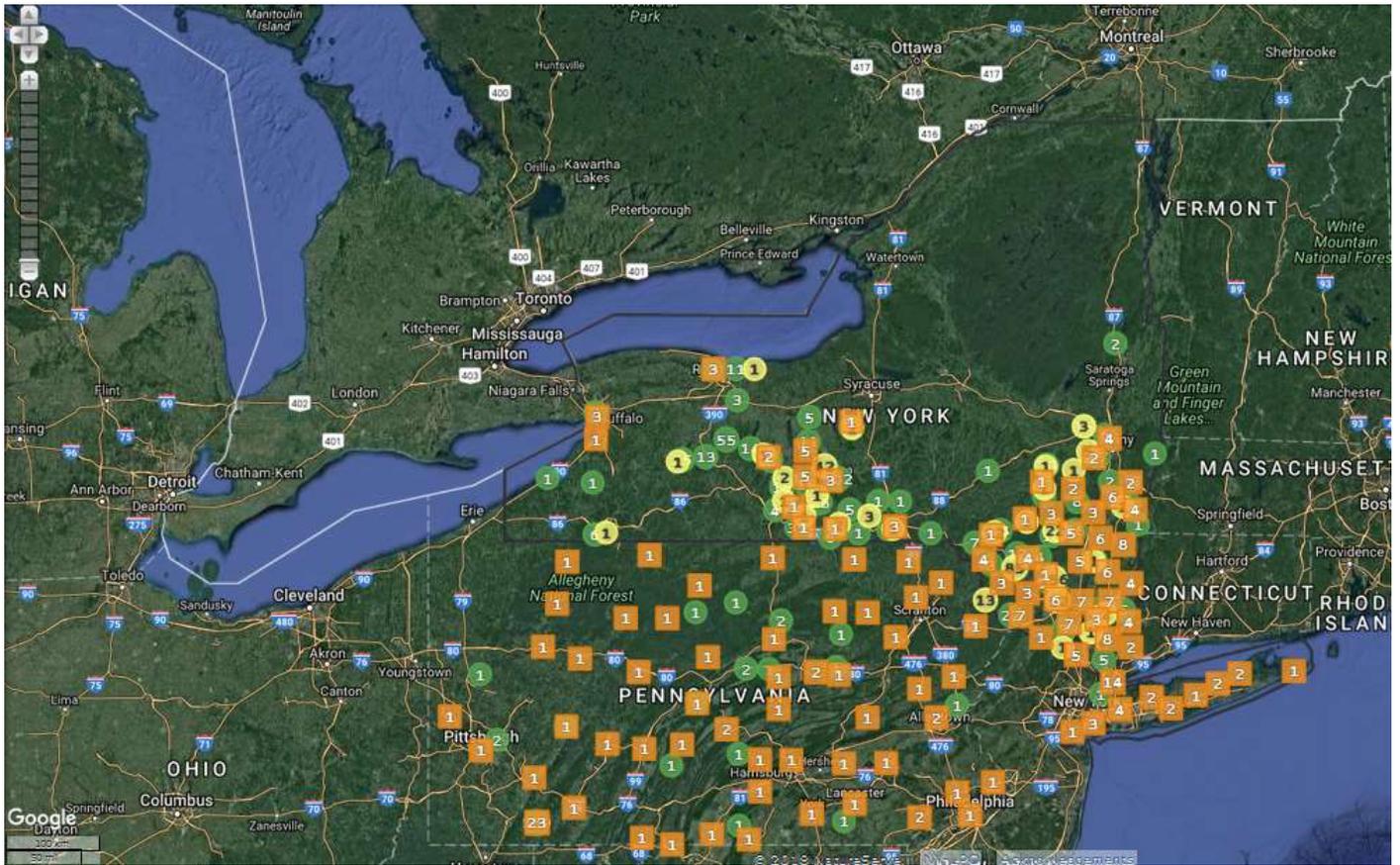


Figure 1 Distribution of HWA in New York State

Hemlocks are a foundation species.² Foundation species are critical species in the habitats they help create.³ In the case of hemlocks they moderate stream water temperatures for trout and other animals, provide a buffer for nutrient inputs to maintain water quality, stabilize shallow soils especially in steep gorges, provide shelter for animals and plants, which is especially important in winter, provide critical habitat for migrating neo-tropical birds, and provide acidic substrate for lichens.

Hemlock stands are significant in Cattaraugus and Erie Counties (see figure below).

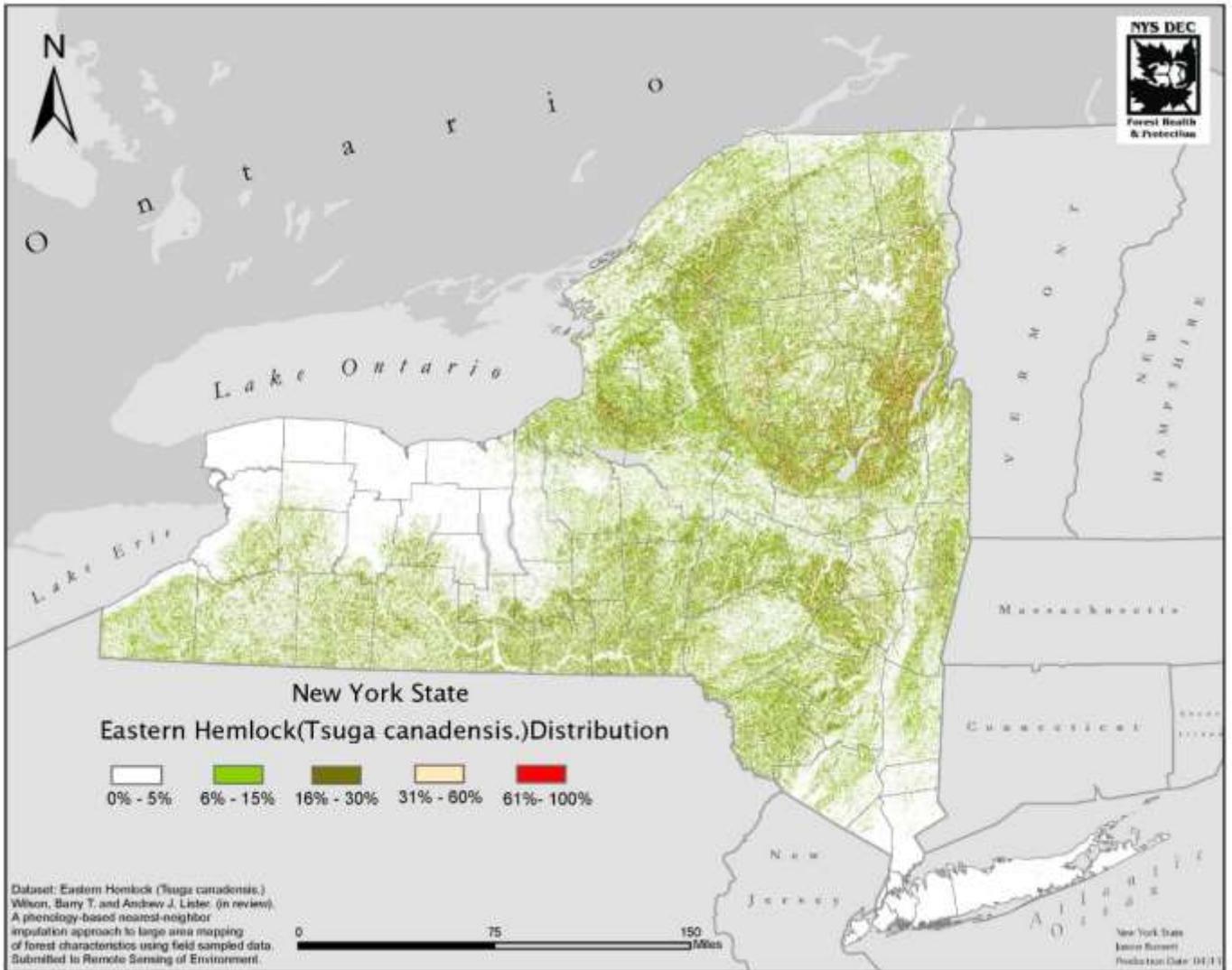


Figure 2 Distribution of Hemlock in New York State

Imagine the impact to the landscape in Cattaraugus and Erie Counties and across the state from a severe decline of hemlock--a highly likely scenario without a significant increase in early detection efforts, treatment, and development of bio-controls, such as the predator beetle (*Laricobius nigrinus*), and silverflies (*Leucopis argenticollis* and *L. piniperda*).⁴

We only need look to places such as the Great Smoky Mountains for an example of the devastation in store for the forests of New York State.⁵ HWA has been advancing quickly through New York State,⁶ and now is in the Adirondack Park in Lake George, NY. Decline of hemlocks is already well underway in the

Catskills.⁷ Anyone who has hiked, paddled, or driven through the Adirondack Park should realize what we will lose. If we do not act quickly, we may lose the species.⁸ We must stop or slow the advance of HWA in New York State before it impacts the significant hemlock stands in the Niagara Frontier Unit.

Prohibit Brine Application on All Roads in the Unit

DEC should protect the forest and streams in the Unit from impacts associated with brine application to roads. We encourage DEC to prohibit the application of brine on all town roads and Public Forest Access Roads that are on State land.

Prohibit ATVs. Establish Baseline Data of Illegal Motorized Use.

We are pleased to see that the current UMP for Zoar Valley prohibits the use of ATVs. ADK does not support the use of ATVs on New York State Land. This prohibition should cover all lands in the Niagara Frontier Unit. Increasingly DEC is under pressure to allow ATV access on state lands in conjunction with local road openings for connections between legal riding areas as defined in NYS Vehicle and Traffic Law 2405. The use of ATVs on public roads is governed by Title 11, Article 48C, Section 2405 of the New York State Vehicle and Traffic Law.

Every pilot ATV program on NY state lands has been shut down because of environmental damage caused by ATVs. For example, the Strategic Plan for State Forest Management outlines several case studies in which ATV trail systems were implemented on State Forest Lands, including New Michigan State Forest, Anderson Hill State Forest, Brasher State Forest, Morgan Hill and Taylor Valley State Forests. All of these trail systems were closed due to the environmental impacts by ATVs on these state forest lands.³

In NYS there has been a significant increase in pressure on the state legislature to pass bills that would increase the current allowable weight of all-terrain-vehicles (ATVs), to 1800 lbs. There is also pressure to allow ATV riding on roads throughout the state that have been opened by local law in violation of New York State Vehicle and Traffic Law, and contrary to NYS Attorney General Opinion 2005-21⁴ and NYS Department of Environmental Conservation (DEC) legal opinion.⁵ ATV manufacturers expressly define that their vehicles are not designed for road or highway use. Documentation by the U.S Consumer Product Safety Commission and the National Highway Transportation Safety Administration's (NHTSA) Fatality Analysis Reporting System (FARS) that a majority of ATV deaths take place on roads.

Prohibiting ATVs on New York State Forests would be prudent given that requests to DEC for ATV connector trails are highly likely to involve illegally opened roadways and larger off-highway-vehicles, which ATV manufacturers have clearly stated should not be used on roads.

Prohibit Motorized Use for Universal Access Sites.

ADK supports the CP3 policy. However, we do not support motorized Universal Access Trails which undermine the CP3 program by providing motorized access to individuals who do not qualify for the CP3 program. Motorized “Universal Access” for the general public undermines the successful CP3 program by destroying the goal of the program which is uncommon access for people with disabilities who may be seeking “...solitude, connection to nature, undisturbed wildlife habitat, and inclusion with fellow sportspeople.” DEC should create areas and trails that take into consideration the different mobility abilities and accessibility needs of individuals and families, but these should be accomplished through non-motorized means.

Addressing Global Climate Change: Manage for Late Successional Forests and Allow Old Growth Habitat to Develop.

Maximizing carbon sequestration should be a priority in our New York State Forests. The New York State Open Space Conservation Plan highlights the need to address global climate change. In addressing global climate change it is important to protect our coastlines, riparian corridors and wetlands; to maintain an interconnected network of protected lands and waters enabling flora and fauna to adapt to climate change; and to maintain and grow our state’s forests. Forests play a large role in mitigating the effects of climate change by naturally storing carbon. Trees are typically about 50% carbon. More than 63% of New York State is forest land, amounting to 19 million acres of land covered by trees.

Approximately 14.4 million acres are privately owned. How forests are managed can play an important role in carbon sequestration and moderation of the heat and dryness impacts of climate change. Trees are unique in their ability to store large amounts of carbon in their wood and studies show that trees continue to add carbon as they grow. A study published in Nature shows that the “Rate of tree carbon accumulation increases continuously with tree size.”¹⁶

The USGS, a coauthor in the study further explains,

“This continuously increasing growth rate means that on an individual basis, large, old trees are better at absorbing carbon from the atmosphere. Carbon that is absorbed or "sequestered" through natural processes reduces the amount of carbon dioxide in the atmosphere, and can help counter-balance the amount of CO₂ people generate. However, [the study is] careful to note that the rapid absorption rate of individual trees does not necessarily translate into a net increase in carbon storage for an entire forest. ‘Old trees, after all, can die and lose carbon back into the atmosphere as they decompose,’ says Adrian Das, a USGS coauthor. "But our findings do suggest that while they are alive, large old trees play a disproportionately important role within a forest’s carbon dynamics. It is as if the star players on your favorite sports team were a bunch of 90-year-olds.”¹⁷

New York’s 19 million acres of trees hold a lot of carbon as do forest soils. ADK urges that NYS manage its state forests with the primary goal of combating climate change and improving its climate resiliency. DEC should also consider management of some state forest areas to promote (new) stands of old growth and mature trees to increase forest carbon stocks, help clean our air and water, preserve wildlife habitat, and provide a setting for outdoor recreation. Existing stands of old growth must be protected.

Managing the Niagara Frontier Unit forests for Late Successional Forests and for new stands old growth habitat would create high quality resilient habitat that would maximize carbon sequestration. We encourage DEC to increase the acreage designated for management as late successional stage forests, protect old growth, and allow new stands of old growth to develop.

Carbon Sequestration should be considered a forest product with economic benefit for the purposes of management.

DEC should have as an **objective for this management unit to “Enhance carbon storage in existing stands.”** However, DEC should revisit the data and sources used in other draft UMPs that led DEC to conclude that logging forest stands for forest products enhances carbon storage.¹⁸ The current rate of logging forests in the United States has decreased the Carbon Storage potential of the U.S. Forests by 42 percent.¹⁹ Although logging and promoting forest products may ultimately keep a specific landscape forested, it is not the most effective way to enhance carbon storage. In fact, more carbon dioxide is released annually from timber harvesting

in the U.S. than from the combined fossil fuel emissions of the U.S. commercial and residential sectors.²⁰ Although forest bioenergy has been considered a renewable resource, it is not a low-carbon energy source and produces about the same amount of carbon as coal per unit of heat released.²¹ Wood-pellets produced in the United States are being shipped to Europe to generate electricity. Using wood in this way to generate power is 50% more carbon intensive than coal-fired generation per unit of electricity.²²

William Moomaw of Tufts University explains, “...under climate accounting rules, emissions from burning wood for energy are counted as coming from land use change — that is, harvesting trees. This means that the United Kingdom is outsourcing carbon emissions from its wood-fired power plants to the United States. And the U.S. forest products industry and U.K. power companies are profiting from **activities that have serious harmful impacts on Earth’s climate.**”²³

New York State must consider these issues when developing UMPs for New York State Forests.

DEC should prioritize protecting old growth stands in this unit.

Historic and Archaeological Site Protection

Any archaeological research must be in consultation with the appropriate Tribal Historic Preservation Office (THPO), that is, with the Saint Regis Mohawk THPO, and the Seneca Nation of Indians THPO.⁹ The UMP for this unit must reflect this important mandated consultation. OPRHP Policy Directive HP-POL-005 (11/01/2016) states,

Historic preservation carried out by federal and state agencies is a collaborative process that encourages communities to be involved in decisions affecting their history. The New York State Office of Parks, Recreation and Historic Preservation and its State Historic Preservation Office (collectively in this document referred to as SHPO) have developed this Policy for incorporating the knowledge and concerns of Indian Nations and Tribes (collectively in this document referred to as Indian Nations) into reviews of projects affecting their historic properties.¹⁰

The policy directive also states,

This Policy clarifies SHPO's process when reviewing projects that directly or indirectly involve interested Indian Nations; it cannot substitute for the obligations of other State and federal agencies regarding consultation with Indian Nations.¹¹

DEC must be proactive in this regard and not assume that approval by OPRHP, the New York State Museum, or APA, alleviates the DEC's responsibility of consulting with Native Nations through their THPOs.

Education, Messaging, and Outreach

DEC should consider Leave No Trace Outdoor Skills and Ethics educational programming and messaging throughout this Unit and on all NYS Public Lands Forest. ADK strongly suggests that DEC *Develop a Leave No Trace Skills and Ethics Integration and Outreach Plan*. This plan should cover messaging on the DEC web pages, at trailheads, on literature, and in programming. The development of the plan should be coordinated with other state agencies and offices to ensure that promotional efforts for Adirondack Tourism that use state funding incorporate Leave No Trace messaging.¹²

ADK also urges DEC to commit to integrated training of Leave No Trace Skills and Ethics on the Trainer or Master Educator Level¹³ for DEC staff and Forest Rangers.¹⁴ The Master Educator level of training would be especially important for Forest Ranger staff who have significant one-on-one interaction with Forest Preserve visitors. DEC is a formal partner with the Leave No Trace Center for Outdoor Ethics and already has Master Educators on staff. Both the Center and the DEC Master Educators could help develop a plan for the agency and provide educational support, tools, and materials. ADK, which is one of ten site providers of Master Educator Courses for the Leave No Trace Center, could also assist in developing a plan.

An important consideration in Leave No Trace outreach involves explaining to visitors why they need to change their behavior in order to conform to land management rules and regulations. For visitors to public lands this makes a connection between their behavior and impacts to the place that they enjoy. Messaging should also include an alternative that complies with the regulations and emphasizes how

following the suggested behavior or action will protect the resource and make the visitor's experience more enjoyable.

DEC should also work with the New York Department of State (DOS) and their new ArcGIS Information Gateway¹⁵ to disseminate rules, regulations, and educational information specific to locations, and land units.

Capacity to Withstand Use

Recently, the Interagency Visitor Use Management Council, a planning entity composed of federal public land agencies (including the U.S. Forest Service and the National Park Service), posted its Visitor Use Management Framework.¹⁶ **This framework could provide additional insight to DEC's long-term planning process which currently involves (1) the goal-achievement process; (2) the Limits of Acceptable Change (LAC) model employed by the U.S. Forest Service; and (3) the Visitor Experience and Resource Protection (VERP) model employed by the National Park Service.** One key component of this framework is the use of a sliding scale for all components of the process, to insure that efforts match the size and scope of the project as well as the resources available.

ADK urges DEC to include indicators and thresholds as described by the Visitor Use Management Framework in its planning to define monitoring objectives, a monitoring schedule, and management actions to be taken should resource conditions deteriorate. **According to the VUMF, "Indicators are defined as specific resource or experiential attributes that can be measured to track changes in conditions so that progress towards maintaining desired conditions can be assessed. Thresholds are defined as minimally acceptable conditions associated with each indicator....Thresholds serve a critical role to alert when conditions are close to becoming unacceptable."**

Minimum Maintenance Roads

ADK is very concerned about Minimum Maintenance Road Legislation (A418/S2537) proposed in the New York State Senate and Assembly. This bill has great potential to preclude access to DEC trailheads for hikers, hunters, fisherman, mountain bikers, and other recreationists on low volume or seasonal roads. The bill would authorize towns to pass local ordinances enabling them to lower the level of road

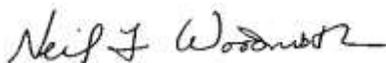
maintenance, stop plowing roads or even abandon roads leading to state trailheads. ADK strongly opposes this legislation, arguing that state taxpayers pay considerable taxes on Forest Preserve lands, state forests, and other state public lands served by these Low Volume Roads (LVR).

In 1885-1886, a legislative compromise was made to allow for the creation of the Forest Preserve which was the passage of a law in 1886 that provided for all lands then or thereafter included in the Forest Preserve to be "assessed and taxed at a like valuation and at a like rate as those at which similar lands of individuals within such counties are assessed and taxed." Since 1886, the RPTL has authorized the State to pay taxes on its Forest Preserve as if it were privately owned. Since all NYS residents benefit enormously from these "forever wild" state forests, it was thought then, as now, that all NYS taxpayers ought to share in full taxes to the hundreds of affected small towns and school districts in the Adirondack and Catskill Mountains. Although the practice of taxing state land began with legislation in 1886 that permitted taxation of the Adirondack and Catskill Forest Preserve, since that time taxability has been extended to reforestation lands, some institutional properties, and parks including Letchworth State Park (1914), the Palisades, Bear Mountain, and Harriman State Parks (1916), the Allegany State Park (1924, 1928), the Saratoga State Park (1930), and the Hudson Highlands and Baird State Parks (1941-42).¹⁶ In 1932 reforestation lands were made taxable, including the beautiful lands of our state forest system, and unique areas such as Zoar Valley. Additionally, wildlife management areas, canal lands, and lands acquired for flood control have also been made taxable over the years. On privately held conservation easement lands across the state, the rights held by the state are also taxable.¹⁷

New York State must protect the right to access state lands and has the right to demand that local roads be maintained given that New York State is paying taxes on state lands as do private citizens.

Thank you for the great work you do protecting and stewarding our New York State Public Lands.

Sincerely,



Neil F. Woodworth

Executive Director and Counsel
Adirondack Mountain Club
neilwoody@gmail.com
518-449-3870 Albany office
518-669-0128 Cell
518-668-4447 x-13 or 25 Lake George office

¹ <https://www.dec.ny.gov/animals/47433.html>

² <http://www.lternet.edu/research/keyfindings/foundation-species-matter>

³ <http://adkinvasives.com/wp-content/uploads/2015/04/WHITMORE-Lk-Placid-28-Mar-15-1.pdf>

⁴ <https://www.nps.gov/grsm/learn/news/new-hwa-beetle.htm>

<https://blogs.cornell.edu/nyschemlockinitiative/biocontrol-program/>

<http://www.news.cornell.edu/stories/2015/06/cornell-introduces-silver-flies-save-hemlock-forests>

<https://blogs.cornell.edu/nyschemlockinitiative/>

⁵ <http://www.lakeplacidnews.com/page/content.detail/id/523715/Flies-could-avert-hemlock-threat-in-New-York.html?nav=5005>

⁶ <http://www.dec.ny.gov/animals/95656.html>

⁷ <https://www.na.fs.fed.us/nanews/nastories/HWA-Study-FINAL-012915.pdf>

⁸ <http://www.lakeplacidnews.com/page/content.detail/id/523185/A-threat-to-hemlocks.html?nav=5005>

⁹ <http://nathpo.org/wp/thpos/find-a-thpo/#ny>

¹⁰ <https://parks.ny.gov/inside-our-agency/documents/GuidancePolicies/ConsultationofIndianNationsTribes.pdf>

¹¹ <https://parks.ny.gov/inside-our-agency/documents/GuidancePolicies/ConsultationofIndianNationsTribes.pdf>

¹² <https://Int.org/>

¹³ <https://Int.org/learn/training-structure>

¹⁴ <https://Int.org/blog/authority-resource-technique-action>

carhart.wilderness.net/docs/manuals/waappg.pdf

¹⁵ <http://opdgig.dos.ny.gov/#/home>

Contact Jeff Herter at DOS for more information: jeff.herter@dos.ny.gov

¹⁶ <https://www.tax.ny.gov/research/property/reports/landcomp/section2.htm#4>

¹⁷ <https://www.tax.ny.gov/research/property/reports/landcomp/section2.htm#4>