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November 12, 2020

NY State Department of Environmental Conservation
Steven Guglielmi, Forester
P.O. Box 296, 1115 NYS Route 86
Ray Brook, NY 12977

Re: Debar Mountain Wild Forest / Draft Generic Environmental Impact Statement

Dear Mr. Guglielmi,

Thank you for the opportunity to comment on NYS Department of Environmental Conservation's Draft Generic Environmental Impact Statement for proposed changes to the Debar Mountain Wild Forest Unit Management Plan. The Preservation League of New York State is New York's statewide historic preservation nonprofit focused on investing in people and projects that champion the essential role of preservation in community revitalization, sustainable economic growth, and the protection of our historic buildings and landscapes. Our track record of advocating for historic and cultural resources within Adirondack Park dates back to the Preservation League's early years, when we successfully advocated to save Great Camp Sagamore from destruction.

Regarding the NYS DEC's proposed Unit Management Plan changes, specifically demolishing the National Register-listed and NYS-owned Debar Pond Lodge, we strongly urge DEC to slow down this process, engage stakeholders that include Adirondack Architectural Heritage, among others, and explore alternatives. Adirondack Architectural Heritage completed a feasibility study to save the Debar Pond Lodge, proposing a variety of options for the Lodge's reuse. We believe that DEC should fully explore the options presented in the feasibility study report, as it clearly states that prudent and feasible alternatives to demolition exist.

The proposal to demolish the NYS-owned, National Register-listed Debar Pond Lodge is also an egregious violation of the 1980 New York State Historic Preservation Act. The demolition will clearly have an adverse effect on a historically and culturally significant property and the state has not given fair and due consideration to demolition alternatives.

Please table the draft scoping statement and allow for a thorough discussion of the alternative solutions for Debar Pond Lodge. Please do not hesitate to contact me with any questions. Thank you for your consideration.

Best regards,

Erin M. Tobin
Vice President for Policy and Preservation

