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Assessing the Feasibility of National Park Service Management in the Adirondack Park

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ASSESSING THE FEASIBILITY OF NATIONAL PARK SERVICE

MANAGEMENT IN THE ADIRONDACK PARK

Abstract

In 1967, two visionary policymakers, Laurance Rockefeller and Conrad Wirth, proposed that a core region of the Adirondack Park be established as a National Park, under the control of the National Park Service. Though unsuccessful, the 1967 proposal addressed a range of contentions, many of which are still relevant today, and also established an ongoing debate on the advantages and disadvantages of federal versus state regulatory action. This paper acknowledges the debate, but finds inherent advantages to an expanded federal role within the Adirondack Park. Times have changed. Attitudes have changed. Tracking the resistance, resentment, attitudes and impacts from 1967, this paper argues that revisiting the idea of having the NPS assume a full or even partial management role of a core region within the Adirondack Park is promising while also acknowledging that the prospect would face significant headwinds.

Background and Significance

In 1967, a group of state planners startled conservationists by putting forward a controversial and imaginative proposal for an Adirondack Mountains National Park. Released by Governor Nelson Rockefeller's office on July 30, 1967, the proposal envisioned that 1.72 million acres of the 6.1 million acres of the Adirondacks inside the Blue Line, mostly encompassing the High Peaks and Central Lakes region, be acquired by the federal government. Had the National Park proposal been successful, it would have been the third-largest National Park back then and the ninth-largest National Park today¹. Excluded from the federal acquisition were five resort enclaves—Lake Placid, Saranac Lake, Blue Mountain Lake, Fourth Lake-Inlet, and Old Forge—hamlets that were envisioned to serve as population centers where core economic and community functions would be concentrated. This proposal came just before the peak of the modern environmentalist movement that began to take shape across the nation, bringing

¹ Pete Nelson. "What would an Adirondack National Park look like?," Adirondack Almanack, <http://www.adirondackalmanack.com/2014/11/what-would-an-adirondack-national-park-look-like.html>, (2014)

along with it an activist federal government which foresaw the importance of legislation protecting public lands. Then Secretary of the Interior Stewart Udall believed that strong federal policy was necessary to make wilderness areas accessible to all Americans. Udall had overseen the creation of five new National Parks, nine National Recreation Areas, and fifty Wildlife Refuges by the end of his tenure in 1969.

The 1967 National Park proposal had several consequences. Firstly, the proposal for a solid block of public land validated the fear among some people who believed that the region's wild character would never be the same so long as the Forest Preserve remained in fragmented ownership. The proposal came at the heels of passage of the Wilderness Act of 1964, evoking the fears and sensitivities of residents against any threat that would infringe upon "forever wild". Secondly, the proposal was a focusing event that sought to reconcile different Adirondack constituencies, from environmental groups to forest industry advocates, from residents to visitors alike, with the discussions over wilderness and open space. As Chairman of the New York State Joint Legislative Committee on Natural Resources, R. Watson Pomeroy, put it "The one good thing this proposal has done is to unite some people who have not always seen eye to eye." Lastly, the proposal brought about the urgency and desire to chart a new and lasting Third Way alternative on how best to manage land-use within the park. Subsequent region-wide agencies like the APA as well as comprehensive plans such as the Temporary Study Commission, and the 1990 Commission on the Adirondacks in the 21st Century, were outgrowths of the controversy surrounding this proposal,² and were part of a broader movement to implement land-use policy on a regional scale during the postmodern era.

Laurence Rockefeller, the principal architect of the National Park proposal, best captured this rationale, saying, "The controversy that has developed as the result of the National Park proposal,

² Tom Cobb, e-mail message to author, July 18, 2015.

however it comes out, will lead toward better protection and management of the Adirondacks.”³ But, not all has come out well. Through the lens of the National Park proposal, one comes to realize how much the park has changed in the past half-century. The cultural attitudes and convictions of people of the Park have changed in response to actions and events over time, and represent a significant departure from the objections that were manifested during the original 1967 proposal, making the resurfacing of alternative management scenarios appealing. The idea for an expanded federal management role in the Adirondack Park, or alternatives that are akin to it have in fact been raised since 1967, but these concepts have never made it beyond an exploratory phase. As the Adirondack Park is faced with new region-wide problems increasingly shaped by actors outside the Blue Line, there will come a time where planners will have to seek the resources of outside agencies such as the National Park Service. Although there are bound to be contentions, the idea for the National Park Service assuming a federal management role within the Adirondack Park may not actually be as remote as it would be assumed at first glance.

“Forever Wild”

The concept of wildness has long guided the protection of the Adirondack Park. Article XIV of the New York State Constitution—the “forever wild” clause has been upheld by numerous executive, judicial, and legislative actions which have tightened protections.⁴ Despite this veneer of security, “forever wild” is being undercut by the contested definitions over wilderness. Wilderness imply different meanings for different people—conservation groups, local government, full-time residents, seasonal residents, and visitors. Preservation-oriented environmental groups and individuals perceive of wilderness as pure. Purists like Bob Marshall, founder of the Wilderness Society, described wilderness as

³ Conservation League. 1968. A Special Bulletin by the Conservation League. The Adirondack Mountain National Park Proposal. New York, New York, March 29, 1968. P8.

⁴ Schaefer, Paul. (1989) “Defending the Wilderness: The Adirondack Writings of Paul Schaefer”, Syracuse, N.Y., Syracuse University Press.

an escape from the strangulation of civilization. "It will only be a few years until the last escape from society will be barricaded. If that day arrives, there will be countless souls born to live in strangulation, countless human beings who will be crushed under the artificial edifice raised by man", Marshall wrote.⁵ To Marshall, wilderness was "the song of the hermit thrush at twilight...unique odor of balsams...feel of spruce needles under foot...It is all of these at the same time, blended with a unity that can only be appreciated with leisure and which is ruined with artificiality," Marshall continued. (Schaefer, 19)

Marshall espoused a purist wilderness attitude where any extractive activity represents an artificiality that takes away from the freedom and redemptive nature of the wilderness. This attitude is still held by groups such as Adirondack Wild: Friends of the Forest Preserve, who embrace a strict adherence to Article XIV, and have been critical of the State's loose interpretation of "forever wild".

Marshall's definition contrasts with moderate individuals and groups such as environmentalist Bill McKibben, and the Adirondack Local Government Review Board who favor a balanced approach between wilderness and economic development. McKibben does not blame man personally for harming the wild. He attributes it to a natural tendency of man to fail to raise the question; can man harm nature? A balanced approach is one in which man is part of the equation of wilderness. William Cronon argues that this essentially is the central paradox. For too long, wilderness has been invented in a romantic sense, by people who have no direct connection to the land, as an uninhabited, un-worked natural landscape, where nature and human are set apart. Cronon believes that the legitimate inheritors of wilderness are people who actually work the land for a living, and envisions a possibility where nature and human can coexist peacefully in an ethical and sustainable way⁶. Cronon recognizes, yet laments the fact that all too often; the protection of wilderness pits urban visitors against rural residents, a dynamic

⁵ Schaefer, Paul. (1989) "Defending the Wilderness: The Adirondack Writings of Paul Schaefer", Syracuse, N.Y., Syracuse University Press. 5.

⁶ William Cronon, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature," *Environmental History* 1, 1 (Jan., 1996): 17

that is very much manifested in the Adirondack Park. Cronon would look favorably upon groups like the Adirondack Local Government Review Board who advocate an environmental ethic that values use just as much as non-use. The balanced view of wilderness treats private and public lands in the Adirondacks as a model of even-handed development, but that burdensome regulations and restrictions on uses and accessibility upend the necessary balance. Still, the bitterest opponents of the wilderness-at-all-costs point of view exhibit a hidden grudge against “forever wild,” which they view as an overreaction to unduly forceful, eco-fascist conservation groups,⁷ and are outspoken on the need to revisit Article XIV. Their representatives at the recent Common Ground Alliance Forum for the Adirondacks described people like Paul Schaefer and other preservationist groups as “rejecting balance”. These divergent interpretations of wilderness were addressed by the National Park proposal, which planned for the degree and extent that wilderness, should be protected by statute.

It is ironic that wilderness purists often demonstrate a stronger allegiance to “forever wild,” yet were almost unanimously against the original National Park proposal. In fact, the proposal would be a realization of the ‘one grand unbroken domain’ vision that drafters of “forever wild” had originally called for during the creation of the Adirondack Park in 1902. Groups such as the Conservation League, Association for the Protection of the Adirondacks, and Adirondack Mountain Club objected ardently to management of the Adirondacks under the National Park Service (NPS), but without necessarily opposing the principle of National Parks in general. The League described the NPS takeover as “one of the boldest attacks ever made on the ‘forever wild’ concept.”⁸ Their protective attitude of ‘forever wild’ in part stems from two points—firstly, suspicion that the NPS’s stance on wilderness differed from their

⁷ Ezra P. Prentice. (October 1968) Archives and Manuscripts Collection. Adirondack Research Library

⁸ Conservation League. 1968. A Special Bulletin by the Conservation League, The Adirondack Mountain National Park Proposal. New York, New York, March 29, 1968.

own, and secondly, cultural attitudes that signaled an aversion to government intrusion—that Rockefeller was an embodiment of this as a proxy of big government.

The National Parks Service's undefined attitude on wilderness was a prime reason that the proposal failed. Conservation groups opposed the proposal at a time when national parks were still regarded as the "nation's playground"—a mentality that encouraged the overuse of public goods. Parks were managed by an NPS who took an overtly bitter stance towards wilderness preservation. But, in the eyes of the NPS, public recreation was not a contradiction to wilderness, as the 1960's generation of preservation advocates would later claim. For the NPS, public parks have always implied a transformation. The National Park Service Organic Act of 1916 directed the agency to "conserve the scenery, natural and historic objects and the wild life therein and to provide for the enjoyment of the same." Preservation and improvement for public use therefore went hand in hand, and guided its response to the recreational pressures of the Automobile Age. Preservation advocates, however, responded to the recreational pressures in a way opposed by the NPS, by redefining wilderness in the landmark 1964 Wilderness Act as areas to be kept inaccessible, and "without permanent improvements." Lithgow Osborne, Conservation Commissioner of New York State from 1933 to 1942, wrote in a 1967 op-ed that the NPS "has been overly susceptible to the pressures of the highway builders, of those who conceive of parks as highly developed, semi rural playgrounds and amusement centers."⁹ Citizens who objected to road building or construction had no legal recourse under the NPS. Throughout the 1960's, the NPS continued to come under mounting criticism for its questionable development projects especially under Mission 66, a ten-year infrastructure improvement plan that was intended to modernize National Parks. The NPS system had earned a reputation of representing incongruity between man and nature at its worst. The Conservation League portrayed in 1967, the

⁹ Osborne, Lithgow. "Against National Park in Adirondacks." *New York Times*, September 10, 1967.

waiting lines of cars and mass crowds as “disgusting”, that “hardly qualifies as an experience that recreates man”, and later criticized the modernization of National Parks, citing unsightly developments at Yellowstone.¹⁰

Groups advocating for wilderness to be maintained in its unaltered state believed that state management was preferable over national management. Their allegiance to state management was grounded in cultural allegiance to the Constitution, in which Article XIV is enshrined, rather than the specific merits of state regulatory actions. The League remarked that insiders knew the best, and that outside New York State, “only a few well informed conservationists had a true understanding of this Forest Preserve protection.” Graham argues that forever wild preservationists preferred to trust the people rather than the federal government¹¹a rationale that is supported in the League’s assessment that national parks were a disguised form of federal intervention that would mark the “only sure way to break the ‘forever wild’ protection.” The time-honored tradition of state ownership and ‘forever wild’ is best explained by conservationist Paul Schaefer, who wrote “The citizens have been involved in long weary, expensive, yet successful battles to prevent exploitation of the Preserve...The people of our state feel themselves part and parcel of every acre of the Preserve and will not transfer personal ownership and control to any outside agency.”¹² Rockefeller represented this outside force by virtue of his promotion of the NPS concept. Conservation groups reacted with ridicule to Rockefeller’s address to the Adirondack Mountain Club on October 28, 1967 because of his zeal in promoting the National Park plan, as someone who would be so accommodating by finding some sort of compromise for everything, that this would actually undercut “forever wild.” The League also dismissed Rockefeller’s pointing out the

¹⁰ Conservation League. 1968. A Special Bulletin by the Conservation League, The Adirondack Mountain National Park Proposal. New York, New York, March 29, 1968. P. 4.

¹¹ Frank Graham, *The Adirondack Park: A Political History* (New York: Random House, 1978)

¹² Thomas L. Cobb, “On the 1967 Proposal for an Adirondack Mountains National Park” *Adirondack Journal of Environmental Studies* 7 (2000)

flaws of state administration's methods of countering the threats to the Park, as "a great lie." The League criticized Rockefeller's declaration that there is an "emerging common goal" towards protection, saying it was inappropriate to call it emerging after 73 years of forever wild, and turned around Rockefeller's words on forever wild, arguing that he was in fact an enemy that looked upon 'forever wild' as a "tired, old slogan."

Purpose and Need: Inadequate State Land Management

Do the strong feelings of people towards the state's ability to manage the Forest Preserve match up with the actual protections on the ground? Thomas Cobb, former New York State Parks and Recreation Specialist evidences that it does not. Cobb noted the glaring inadequacies of state administrative policies and practices. He wrote "the park concept competed with the forest preserve concept; and that the administrative structure of the Adirondacks urgently required attention."¹³ Since the creation of the Forest Preserve in 1885 to the present day, the Forest Preserve was governed by the Conservation Department, which became the Department of Environmental Conservation (DEC) in 1971. The DEC was an anachronistic agency, wholeheartedly believing in the value of clear-cutting the Adirondacks. This contrasted with the values of recreation, wilderness management and environmentalism, which captured the public's affection at the peak of the environmentalist movement in the 1970's. The staff at the DEC was not trained for and knew nothing about these values. Rockefeller evidenced this in his October 28, 1967 speech to the Adirondack Mountain Club, where he stated "you are well aware that the state is carrying out development in the Forest Preserve. Such development probably violates the letter of the Constitution".

¹³ Thomas L. Cobb, "On the 1967 Proposal for an Adirondack Mountains National Park" *Adirondack Journal of Environmental Studies* 7 (2000) 1.

The DEC was originally envisioned as a fresh, new public lands manager with regulatory teeth—a state-based solution that would have the capacity to solve the problems that Rockefeller’s National Park plan addressed. Upon establishment however, this was not the case. The DEC has stuck to old ways of thinking, reminiscent of the days of the Conservation Department. For example, in the realm of the Forest Preserve, the DEC often had to deal with conflicts between user groups and environmentalists, and the DEC has been inconsistent in dealing with different groups, at the beck and call of favoritism and special interests, usually a problem more commonly faced by local governments. Their funding for fish and wildlife took away funds for lands and forests, and the independence of regional offices promoted uneven approaches to land acquisition and other environmental matters. (McMartin, 21) One of its greatest shortcomings, however, was the inability to implement guidelines set forth by the State Land Master Plan (SLMP), the public lands classification document, and move the different administrative regions forward together¹⁴. The failure to develop unit management plans that inventoried natural resources, public and administrative facilities and its actual and projected use, land acquisition priorities, is similar to the incompetency of its predecessor agency.¹⁵ The DEC failed to live up to the standards of Rockefeller—it consistently worked against the hoped-for replacement action that Rockefeller wanted after the National Park proposal was scuttled.

The Adirondack Park Agency (APA), the DEC’s parallel agency that manages the 57% of private land within the Blue Line, has also suffered from inefficient implementation of policies. Firstly, the APA’s park planning agenda has not been well based on facts, and its park planning efforts have not self-evaluative in terms of reflecting on methods that could best mitigate adverse environmental impacts. Secondly, there is a lack of land use planning—one in four Adirondack communities still have not adopted comprehensive land-use plans, and only 17.6% of Adirondack communities have APA-approved

¹⁴ McMartin, B. (2002). *Perspectives on the Adirondacks*. Syracuse, New York: Syracuse University Press. 25

¹⁵ Ibid. 64.

plans. (AJES) Thirdly, the Private Land Plan of the APA, being a work of political compromise left regulations watered down and merely placed a cap on development, rather than halting development. Sprawl-like development has been taking place along roadsides and seashores especially in Moderate Intensity, Rural Use, and Resource Management areas. Cobb's colleague on the Adirondack Council stated "nine out of ten houses are built outside hamlets. That's unsustainable."¹⁶ Bob Glennon, former Executive Director of the APA criticized the agency's refusal to cluster and concentrate development in order to protect open space. Glennon stated "We have a Park Agency that simply doesn't get it." The APA has not been capable of solving the problems of land speculation, unplanned development or sprawl—failing to address the core issues originally mentioned in the 1970 Temporary Study Commission. Between 1988 and 1990, over 100,000 acres of forest were lost to the hands of land speculators! The APA lacks the adequate authority to prevent such developers from avoiding review by piecemealing or segmenting projects.

The APA was created during a time of alarm that pressured policymakers to wield the power of regional planning as the remedy to threats facing the Adirondack Park. As this cutting-edge model begins to lose its luster, the APA is battling the headwinds of a shift in the environmentalist movement. 'Forever Wild' advocates used to claim that the growth of public Forest Preserve land is telling of the fact that state management is working. But, Bill McKibben believed otherwise. McKibben argued in explicit support of revisiting the National Park proposal that the expansion of state land provides "critical habitat and promise for the future" that allows for the idea of a federal NPS park to thrive¹⁷. On another end, Essex County Planner, Bill Johnston voiced that the APA's approval of Jay Mining fuelled his stance for stricter and stronger regulations. (Bill Johnston, personal communication, July 15, 2015)

¹⁶ Phil Brown. The Future of Open Space http://www.adirondackexplorer.org/apa_book/future-open-space

¹⁷ Winks, R.W. (1997). Laurance S. Rockefeller: Catalyst for Conservation. Washington, District of Columbia, Island Press. 105.

Formerly supportive environmental groups are now criticizing the decisions made by the APA, and with each passing controversy, groups have taken even stronger positions than those of the APA. As the APA has shifted to the right towards economic development, environmental groups have positioned themselves further to the left. At the far left of the conservation preservation spectrum stands Adirondack Wild: Friends of the Forest Preserve and its 2010 creation is telling of the fact that attitudes in the Adirondack Park have and will continue to change, as the institutional approaches towards protected area management applied to the region evolve.

Phil Terrie argued in 1990 that the need to perceive the Adirondacks in a comprehensive, regional manner is “now greater than ever before”¹⁸. There needs to be a recast of regulatory tools and approaches that can efficiently implement management policies in the Adirondack Park in an efficient manner, treating the region as a cohesive regional entity. An expanded federal role is a way to achieve this. Wink has argued that the commercial development that is legal under the APA’s watch would have been prevented under NPS control.¹⁹ Similarly, Labelle (1990) argued that “Important development should be regulated by government that represent all the people whose lives are likely to be affected by it, including those who could benefit from it as well as those who could be harmed by it. When a regulatory decision significantly affect people in more than one locality, state or even federal action is necessary.” Given the pitfalls of state action, Labelle (1990) thus implied that federal NPS action would yield benefits.²⁰

Since the original National Park proposal, reports like the 1970 Temporary Study Commission and the 1990 Commission of the Adirondacks in the 21st Century have contemplated the clear

¹⁸ Philip Terrie. “Technical Report 1: A Park for the Adirondacks” in Commission of the Adirondacks in the 21st Century. *The Technical Reports*, vol. 1, Albany, N.Y., 1990 p. 21.

¹⁹ Winks, R.W. (1997). Laurance S. Rockefeller: Catalyst for Conservation. Washington, District of Columbia, Island Press. 103.

²⁰ Judith M Labelle. (1990) “Contemporary Land Use Regulation in the United States” in Commission of the Adirondacks in the 21st Century. *The Technical Reports*, vol. 1, Albany, N.Y.

advantages in forging a stronger partnership role with the NPS. The 1970 Commission sought to answer two questions which were also echoed in the 1990 reports—first, what should be the long-range policy of the state in acquiring Forest Preserve land? Second, should there be a more flexible policy regarding consolidation of public lands. The 1990 Commission Reports was initiated by then Governor Mario Cuomo, because the 1970 Temporary Study Commission “did not go far enough²¹.” Many observers considered the Adirondack Park Land Use and Development Plan density-based zoning flawed, and hoped that the Commission’s recommendations on stricter zoning, concentrated hamlet development, and public land consolidation would be implemented. The report was drafted by people “who knew what they were doing,” and had a valid thrust. The 1990 reports, technical addendums, and attitude surveys was the last comprehensive review of the Adirondacks, coming at the bookends of an internal planning document in 1988, which resurfaced the National Park idea. The existence of the 1990 Commission reaffirmed the fact that “standards are being compromised” under the APA and that “development should not happen anyplace, anytime and anywhere.” It brings into light an NPS management model that would offer better protection of natural resources through the consolidation of public lands, provide the technical expertise and monetary resources that come along with stewarding large parks, and ensure long range consistent park planning through unified management.

Firstly, NPS control would be beneficial to fulfill the objective of public land acquisition. Using the 1967 National Park implementation timeline as a template to study how this objective would be fulfilled, shows that federal acquisition would be quicker than state acquisition rates. Under the DEC, negotiating even one parcel of land could take up to several years, stymied by a process designed to protect public funds. Easement acquisition has been hampered by the lack of agreement between the

²¹ Tom Cobb, personal communication, August 4, 2015

DEC and property tax assessors on determining tax assessments for those lands²². NPS recommendations stated that “undeveloped land would be acquired for park purposes as rapidly as possible by transfer, purchase, exchange or donation.” As examples in other places of the country have shown, a designation of the Adirondacks under a National Recreation Area, which emphasize a scarce open space area close to large population centers, would not only increase options for public land holdings, but also provide for cooperation with local parties and the private sector to direct the minimal purchase of private land while achieving the maximal protection²³. The Cape Cod National Seashore permitted relatively generous private inholdings, and guided and adapted local zoning in a way that did not require a lot of private property purchases within the protected area, thereby minimizing the disruption on local households and lifestyles.²⁴ Under state management today, there is no clear authority to authorize land exchanges on detached parcels for the purpose of consolidating public ownership. Acquisition could be achieved either via fee or easement purchases. Dawson (1990) argued that “fee acquisition may be recommended when other methods of protection have been found to be inadequate, inefficient, or ineffective to meet management needs.” Dawson (1990) also noted that acquiring and consolidating resource management lands through fee acquisition or easement “may be the only certain long-term mechanism to protect open space in the Adirondack Park.” These regions of private holdings only remain in unspoiled condition, because economic conditions necessary for change have not materialized. Both the Rockefeller and Cuomo Commissions had similar bottom lines in consolidating public land and its recommendations are viable, noted Cobb. While the Adirondack Park

²² Commission on the Adirondacks in the 21st Century. *The Adirondack Park in the 21st Century*. Albany, N.Y., April 1990. P 57.

²³ Thomas L. Cobb (1990) “An Overview of National Park, National Forest, and other Protected Area Management Systems with Selected Institutional Case Examples in Commission of the Adirondacks in the 21st Century, *The Technical Reports*, Vol. 1. Albany, N.Y., p. 289

²⁴ Commission of the Adirondacks in the 21st Century. *The Technical Reports*, vol. 1, Albany, N.Y., 1990 p. 294

Open Space Plan has served as a “guiding light” for park planning purposes²⁵, and has been implemented well, federal management gets the job done faster and better.

Secondly, an NPS regulatory layer would enhance collaboration between different levels of government. In the past, the State had subordinated local involvement, fearing the residents’ anti-regulation tendencies exhibited in their animosity towards the APA. The state barred local officials from serving on the APA on the basis that they would be seen as symbols of big government victims²⁶. But, the Residents Committee for the Protection of the Adirondacks (RCPA) has a different stance, advocating for both government restrictions and local involvement²⁷. Similarly, Holland (2011) noted that while town-level planning in the Adirondack Park is a great way to enhance participatory decision-making, a top layer of coordination is needed to shepherd comprehensive planning²⁸. Local governments should not shy away from comprehensive land management plans because it is complicated or expensive, but they should also not act on their own. Local agencies, which heavily represent private owners “do not always act to support desired ecological conditions”, because economic incentives in resource use framework induce development.²⁹ Tendency for inter-municipal competition for capital investment also leads to local decisions that may not consider the cumulative impacts of development on the open space character of the region.³⁰ Don Kelley, Town Codes Enforcement Officer for Webb, noted “Most localities do not have the staff or expertise to submit regional projects to the kind of review necessary and customary. I think it would be unfair to expect that a locality could list and consider all possible regional issues when considering a project”³¹. On the other hand, an expanded NPS

²⁵ Tom Cobb, personal communication, August 4, 2015

²⁶ McMartin, B. (2002). *Perspectives on the Adirondacks*. Syracuse, New York: Syracuse University Press. 163.

²⁷ Ibid. 153.

²⁸ Holland (2011)

²⁹ U.S. General Accounting Office. Ecosystem Management: Additional Actions Needed to Adequately Test a Promising Approach, GAO-94-111 (Washington. D.C, 1994) Retrieved from Adirondack Research Library

³⁰ Daniel P. McGough (1990) “Incentives for and Effectiveness of Local Land-Use Regulatory Programs” in Commission of the Adirondacks in the 21st Century. *The Technical Reports*, vol. 1, Albany, N.Y.

³¹ Ibid.

role would take appropriate anticipatory actions such as working actively with property owners, state and local agencies, to review plans for development, assess present and projected use of public facilities, and its present and potential impact on natural resources, in order to ensure land-use compatibility. As evidenced previously, this has not been delivered under existing state management.

Thirdly, an expanded NPS role would provide for more technical assistance, thereby ensuring better project review and development stipulations. Hands-on technical assistance was a buzzword at the recent Common Ground Alliance Forum. Concerned citizens complained that APA funding for localities are being stripped. The NPS advisory role has the valid technical capacity to push the APA to enact quality assurance standards to ensure that local management plans comply with its regulations over time.³² An expanded NPS role would also serve as a powerful deterrent to new development and landscape alteration by having the right of final comment over licenses and permits to be granted. Cobb agreed that this is a valid idea. Former Executive Director of the Association for the Protection of the Adirondacks from 1987-2010, and Partner at Adirondack Wild, David Gibson suggested that the technical arm of the NPS would be able to help state agencies resolve their weaknesses, though it would not be a logical replacement for the agencies like the APA. Gibson stated “the technical arm of the NPS could become more a technical planning partner with the APA. And perhaps more.” A closer NPS partnership has the likelihood to go beyond technical planning.

Lastly, an expanded federal role under the NPS would unify management. While the APA covers the entire Park, the state land is overseen by two DEC regions. Another six state sub-agencies all delineate different boundaries of control. An NPS management role would avoid duplication of

³² Thomas L. Cobb. (1990) “An overview of National Park, National Forest and other protected area management systems” in Commission of the Adirondacks in the 21st Century. *The Technical Reports*, vol. 1, Albany, N.Y. p. 230

functions, already served by other public or private agencies³³. For many concerned individuals and groups, “regulatory overlap” has registered on their minds as a key detractor to progress. A GAO report in August 1994 noted that numerous landowners and multiple authorities such as environmental protection agencies, local governments, industrial and non-industrial landowner “poses tremendous institutional challenges to coordinated management.”³⁴ By consolidating a core portion of the Adirondack Park into a National Park, and allowing the state to focus on other needs, NPS management would be the quickest way to streamline regulations and policies.

Aside from the specific actions that the NPS would take, there are several light-handed and practical concrete management models in which an expanded federal role would promote collaboration between different levels of government, increase technical and monetary assistance and strengthen protective stipulations. The first model would be to incorporate and merge the State Wild and Scenic Rivers System into the Federal Wilderness Preservation System, effectively implementing Recommendation #230 of the 1990 Commission Report. Cobb indicated his desire for this recommendation to come to fruition, which would serve as the genesis for any expanded federal management role³⁵. But, it must be acknowledged that federal management of state-designated rivers goes through a process including a review of local support or opposition, state/local land use controls, state/local government’s capacity to manage and protect natural features on non-federal land³⁶. Clearing this review hurdle is a challenge to overcome. As of present, the State System has lain dormant

³³ Conservation Department. 1968. The Adirondacks: New York’s Forest Preserve and a Proposed National Park. Albany, N.Y., State of New York Conservation Department.

³⁴ U.S. General Accounting Office. Ecosystem Management: Additional Actions Needed to Adequately Test a Promising Approach, GAO-94-111 (Washington. D.C, 1994)

³⁵ Tom Cobb, personal communication, August 4, 2015

³⁶ U.S. Department of the Interior, Bureau of Land Management, *Memo-6400 Wild and Scenic Rivers: Policy and Program Direction for Identification, Evaluation, Planning, and Management*, Manual Transmittal Sheet, <http://www.rivers.gov/documents/blm-policy-manual.pdf>, July 13, 2012. (accessed August 12, 2015). 3-7.

and has not designated new rivers within the Adirondack Park since 1982.³⁷ State law only provided for minimal protections³⁸. However, upon incorporation, the Department of the Interior would be able to develop meaningful relationships with localities, non-profit groups and the public in order to evaluate and manage future additions of rivers to the National System. State and federal budgetary funds would be pooled together and used to manage river corridors. Where wilderness and wild rivers designation overlap, protections would be strengthened. Under such a merger, extractive mineral works would be prohibited within a quarter-mile of any riverbank³⁹. It would be quite difficult to imagine the Jay Wilderness Mountain mining proposal clearing the extra layer of protective stipulations! Federally-managed rivers will determine an actual level of visitor use that would not degrade river values, require permits for all commercial users, and if necessary, non-commercial users beyond one shoreline mile of designated river shores⁴⁰. Regardless of the river classification as wild or scenic, NPS administration would ensure that these rivers stay the way they were when designated. At the same time, this incorporation would satisfy local objectives of maintaining private property rights⁴¹.

The second model would be to revitalize and expand on the Adirondack-Lake Champlain Biosphere Reserve concept. Biosphere Reserves are ratified by a national committee, designated by UNESCO's Man and the Biosphere Program (MAB), and remain under state jurisdiction. Yet, organization

³⁷ Fosburgh, Jamie. "New York Segments." National Park Service: U.S. Department of the Interior. Last modified Feb. 27, 2009. <http://www.nps.gov/ncrc/programs/rtca/nri/states/ny.html>

³⁸ U.S. Fish and Wildlife Service, National Wild and Scenic Rivers System. *Delegating Rivers Through Section 2(a)(ii) of the Wild and Scenic Rivers Act*, by Dan Haas, Technical Report of the Interagency Wild and Scenic Rivers Coordinating Council, National Wild and Scenic Rivers System (Richland, Washington, 2000) Last modified June 2007, <http://www.rivers.gov/documents/2aii.pdf>.

³⁹ Thomas L. Cobb. (1990) "An overview of National Park, National Forest and other protected area management systems" in Commission of the Adirondacks in the 21st Century. *The Technical Reports*, vol. 1, Albany, N.Y.

⁴⁰ U.S. Department of the Interior, Bureau of Land Management, *Memo-6400 Wild and Scenic Rivers: Policy and Program Direction for Identification, Evaluation, Planning, and Management*, Manual Transmittal Sheet, <http://www.rivers.gov/documents/blm-policy-manual.pdf>, July 13, 2012. (accessed August 12, 2015).

⁴¹ "About the WSR Act: Safeguarding the Character of our Nation's Unique Rivers." National Wild and Scenic Rivers System. Last modified 2015. www.rivers.gov/wsr-act.php

of the Biosphere Reserves mirrors that of a protected area such as National Parks⁴². National Park organizational plans laid out specific core zones for wilderness protection, as well as transition zones and research and development zones. They were vital tools that planned for and limited the extent of recreational development⁴³. Similarly, the core, buffer, and transition zones of Biosphere Reserves which serve multiple-uses such as conservation, development, and research are vital conceptual assets that serve to integrate protected areas into the surrounding landscape⁴⁴. Management of Biosphere Reserves is open, transparent, adaptive, and locally-engaged. The management concept fits neatly into decades-long and growing community desires for more local control. The integration of the Adirondack-Lake Champlain Biosphere with other MABs into a network will facilitate worldwide exchange of technical expertise and information. Cobb expressed that the Biosphere Reserve concept is therefore “critical, and viable sooner or later,” and that “considerable attention is emerging in the U.S. to make the MAB program work.” At present, the Adirondack-Lake Champlain Biosphere Reserve is “dysfunctional”, as “they are doing nothing to comply with the program” with “yearly reviews not being followed through,” Cobb explained. Although specific solutions to revitalize the Biosphere Reserve concept are currently being explored by a University of California professor and have not been detailed yet,⁴⁵ the Biosphere Reserve would certainly provide the equivalent advantages of stronger partnership and implement key recommendations such as promoting international recognition of the Adirondacks, and the building of research stations outlined in the 1990 Commission Report. As Cobb noted on this point, “it doesn’t matter who has the jurisdiction” in terms of building research stations and the like, but rather that such a management concept currently being discussed would mirror the 1990 Commission

⁴² “FAQ-Biosphere Reserves?” UNESCO, <http://www.unesco.org/mab/doc/faq/brs.pdf>

⁴³ Ethan Carr. (2000) “Taking Stock: Changing Ideas and Visions for Parks-Park, Forest, and Wilderness” *The George Wright Forum* 17, (2), Denver, CO, p. 22.

⁴⁴ Thomas L. Cobb. (1990) “An overview of National Park, National Forest and other protected area management systems” in Commission of the Adirondacks in the 21st Century. *The Technical Reports*, vol. 1, Albany, N.Y. p. 289

⁴⁵ Tom Cobb, personal communication, August 4, 2015

recommendations, speaks to the enduring validity of a discussion surrounding an expanded federal management role in the Adirondack Park.

The third model would designate the Adirondack Park as a National Park Service partnership park. Partnership parks would not transfer ownership to any federal agency nor impose land-use controls. Partnership parks are a non-traditional type of park unit that has emerged in the past decade⁴⁶. There are now fifteen affiliated NPS partnership parks in the form of National Heritage Areas across the country, with a torrent of new partnership parks being proposed.⁴⁷ This sort of collaboration is being built upon and expanded more and more, noted Cobb. They are co-managed between the National Park Service and state regulatory agencies, community groups, and private sector corporations. The federal role in a partnership park would be limited to funneling federal dollars or providing technical assistance to local environmental efforts. When I asked Cobb how he would welcome this assistance, he replied that “having federal monies flow through the state would be great!” More funding for local communities would rebalance the skewed way localities depend on economic projects that would boost their tax base, resulting in better protection. Precedents have shown that partnership parks lend advantages far beyond land management, but also to areas relating to interpretive services, trail maintenance, cultural landscapes, folklore and much more⁴⁸. An Essex National Heritage Area partnership park in Massachusetts has generated \$154 million in economic output and \$14.3 million in tax revenue largely by having the NPS work together with the tourism council to encourage visitors to stay longer. Recreational trails, scenic byways, joint marketing visitor programs has resulted in an active

⁴⁶ Elisabeth Hamim, “The US National Park Service’s partnership parks: collaborative responses to middle landscapes,” *Land Use Policy* 18, (2001): 1.

⁴⁷ Brenda Barrett, “New National Parks in the 1990s: Thinning of the Blood or a Much Needed Transfusion,” last modified July 10, 1991, <http://livinglandscapeobserver.net/wp-content/uploads/2014/01/New-National-Parks-in-the-1990s.pdf>

⁴⁸ *Ibid.* 1.

healthier population residing in revitalized and reconnected Essex hamlets⁴⁹. Another NPS partnership named Acadia Trails Forever in Acadia National Park is a public-private fundraising partnership that augmented the Park's capital budget, and resulted in accelerated trail maintenance, and additional resource management staff that enforced Wilderness Act leave-no-trace principles, and monitored road usage. Visible on the ground progress was consistently seen, and has helped to inform and improve public perception⁵⁰. Another partnership between the National Park Service and the New Jersey DEC at the New Jersey Pinelands Reserve resulted in a state-of-the-art interpretive brochure, and associated interpretive systems such as wayside exhibits, kiosks, and educational centers⁵¹. The provision of interpretive services is the signature strength of the National Park Service. Another NPS partnership with the California Department of Parks and Recreation at the Redwoods State Park has also resulted in better visitor programs and an improved joint capacity to manage the park resources. Both agencies capitalized on the partnership to win greater consideration for funding and grants⁵². Partnership parks allow each agency to delegate tasks and work according to their respective strengths. Informal and interagency relationships are just as important as formal regulatory statutes in a partnership park model.

Discussion

The reality of the NPS assuming a full or even partial management role of a core region of the Adirondack Park faces significant headwinds⁵³. Some park units are easier to create depending on size,

⁴⁹ U.S. National Park Service. *Economic and Community Impact of National Heritage Sites*. Available at: <http://www.nps.gov/heritageareas/Economic%20and%20Community%20Impact%20of%20National%20Heritage%20Areas%202014.pdf>. (Tripp Umbach 2014 Case Study).

⁵⁰ Steele, Sheridan and Marla Stelpflug O' Bryne. "Acadia Trails Forever," National Park Service, U.S. Department of the Interior, Posted September 19, 2003, http://www.nps.gov/partnerships/acadia_trails_forever.htm

⁵¹ Leaken, Paul. "State unveils new brochure highlighting the treasures of the Pinelands National Reserve of Southern New Jersey," New Jersey Pinelands Commission Press Release. May 9, 2008.

⁵² Murray, Ray. "NPS-California State Parks Statewide Partnership," National Park Service, U.S. Department of the Interior. Last modified November 2003. www.nps.gov/partnerships/california_stateparks_partnership.htm

⁵³ Dave Gibson, e-mail communication, July 16, 2015

acquisition needs, presence of exploitable resources, park type etc. It would be more difficult for the NPS to assume a direct management role like turning the Adirondack Park to a National Park than it would be for the federal government to assume an indirect management model, like the ones outlined above.⁵⁴ Ideological opposition could be tempered if people associate the Adirondack Park as a heritage area worth enough local pride⁵⁵. Significant differences in cultural norms between full-time residents and visitors also shape attitudes. Full time residents were likely to rely amongst themselves to settle land-use issues, reflecting their preference for home rule, while visitors would be much more agreeable to bringing in outside expertise. The Adirondacks under NPS control “would be ideal, but may not be desirable”, noted Gibson. Ideological attitudes are hard to overcome, as a lot of misconceptions abound about the NPS mission and management models, and thus unfairly increase the odds for an expanded federal role. Cobb noted that the antagonism towards the 1990 recommendations were “more about the process, and not so much about the facts.” Signs such as Dump Cuomo and shouting matches with Commission drafters reflected popular anger and blame that effectively disrupted decorum and drowned out rational voices. Alternative, non-traditional federal management models may not have the same recognition or namesake as National Parks, but it would address the process by empowering local and regional actors, and respecting the strong tradition of in-state public participation, while also upholding a better standard of protection than what has been afforded under the status quo.

At the same time, there are other objections related to taxes and tourism that deserves acknowledgement, yet a current reading would suggest numerous counterpoints that render opposition on these two grounds moot. The question of taxes has long spurred contentious debate on the idea of having the NPS assume control of a region of the Adirondack Park. Under a National Park, the federal

⁵⁴ Tom Cobb, personal communication, August 4, 2015

⁵⁵ Brenda Barrett. “New National Parks in the 1990s: Thinning of the Blood or a Much Needed Transfusion,” Living Landscape Observer, last modified July 10, 1991, <http://livinglandscapeobserver.net/wp-content/uploads/2014/01/New-National-Parks-in-the-1990s.pdf>

government would only continue to reimburse local governments on a gradual drawdown of 5% per year for up to fifteen to twenty years or whenever the private acquisition is complete. This sunset deadline put a lot of communities in an uncomfortable position, especially as the share of state tax payments to local governments has only grown. In 1960, NYS paid \$2,197,491 million dollars in taxes to local governments. In 1967, NYS paid \$3,559,443 to local governments, a nearly 70% increase in seven years!⁵⁶ The buy-up of land by tax-exempt non-profit companies and foundations also eats away at the local tax base, and the state is compelled to continue subsidizing local communities at tax rates far higher than that for private owners. (Graham, 234) As people are unwilling to imagine how payments in lieu of taxes would happen, they quickly came to the conclusion that a downsizing of public services would occur in communities all across the Adirondacks.⁵⁷ A downsizing of government and associated services would inevitably result in population loss, and it would curb demand for new housing and strip development. But, this downsizing would also yield benefits. Larger hamlets, resort enclaves, and border towns, would almost certainly benefit from the influx of population. (Common Ground Alliance, July 15, 2015) This would force development, new amenities, and infrastructure to occur at the resort enclaves, helping the NPS achieve its land-planning objectives. Given that the topic of consolidating hamlet development was raised at the Common Ground Alliance Forum, these objections should be reframed in a positive light.

Increased tourism is another significant byproduct of direct NPS management in the form of National Parks. A letter to Ezra Prentice dated October 22, 1968 is reflective of the popular tension at the time. The letter stated that “conservation groups...have successfully blocked any constructive legislation for the more effective use of the Adirondacks”. He describes the failed National Park proposal

⁵⁶ Conservation Department. 1968. The Adirondacks: New York’s Forest Preserve and a Proposed National Park. Albany, N.Y., State of New York Conservation Department.

⁵⁷ Conservation Department. 1968. The Adirondacks: New York’s Forest Preserve and a Proposed National Park. Albany, N.Y., State of New York Conservation Department.

as a “classic example” of working against statewide economic interests. This letter underscored that conservation groups in 1967 associated the NPS more for economic benefits. This evokes the paranoia of conservation groups at the time, uneasy about broader sweeping definitions of use, commonly associated with mass crowds, and fear that it would bring in new types of recreation use in the Adirondacks never seen before. For too long, preservationists in the Adirondacks have associated the NPS on solely economic terms, and have consequently refused to entertain the National Park idea. At the same time, it reflected the public concerns at the time of a languishing forest industry, and the need for economic revitalization. While this debate has continued to play out today, a shift of attitudes in conservation groups during the past half century have resulted in less negative association between National Parks and tourism. A survey of recommendations from the 1990 Commission Report, found that there was strong agreement amongst all constituents, that the economic lifeblood of the region is tourism. Graham argued “People who come now don’t mind the crowds, In fact, they like them. They are sightseers and they come for the action.” (Graham 226). People are no longer uneasy about mass crowds and have grown used to seeing non-resident visitors. Conservation groups have recalibrated their original views on the NPS and have begun to evaluate the agency on environmental terms instead.

As the environmentalist movement and the National Park Service have matured over time, a more favorable portrayal of a federal management role has emerged. Winks noted “perhaps in another few decades, when the NPS was less likely itself to infringe on the forever wild principle, and when the national park ethic had evolved to a point that there would have been less cause to fear new recreational infrastructure...the idea might have moved forward.⁵⁸ Laurence Rockefeller arguably provided the scaffolding which has resulted in a more stringent and stronger NPS. Rockefeller steered the NPS more towards protection, and less on use. The NPS has come to terms with the national

⁵⁸ Winks, R.W. (1997). *“Laurence S. Rockefeller: Catalyst for Conservation”*. Washington, District of Columbia, Island Press. 105

wilderness consciousness that emerged during the 1960's, and adapted it into its management framework. At the same time, wilderness advocates have begun to tolerate a reality of some public use. No longer are wilderness advocates complaining about overcrowded front country facilities as they were in 1967. Rockefeller's charge for the NPS were clearly stated in a letter dated November 15, 1968 entitled "Strong Feelings", and sent to David McAlpin, who was involved in the 1970 Temporary Study Commission that was critical of the National Park proposal. The letter highlighted his feelings for stringent safeguards...to protect the unique wilderness character", and his willingness to define wilderness according to the Federal Wilderness Act of 1964—where it is an area "where Earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain". His feelings are also codified in an unofficial 1968 report on the National Park proposal stating his desire for the natural ecosystem to return "to the grandeur that the area possessed when frontiersmen first saw it⁵⁹". This has ensured that the backcountry were removed from the crowds, and managed with the intent to preserve wilderness values.⁶⁰ Although the National Park Service is not without its flaws, its management has made significant progress since 1967. The resources and technical expertise of the Department of the Interior despite funding squeezes in recent years, far outstrip that of the DEC and APA, state agencies which have discharged staff front and center. When I asked Tom Cobb how the National Park Service would compare with existing state management in broad, overarching terms, he stressed the contrast by speaking highly of the NPS. Cobb noted with aplomb, "The NPS does not compromise on its standards." Likewise, Gibson expressed that if deterioration of state management continues to occur, the NPS idea would be revisited in the near short-term. Gibson remarked "In the next five years, Adirondack Wild would not be afraid to advocate for an NPS role in the Adirondack

⁵⁹ Wirth, Conrad L., B.H. Thompson, Roger Thompson. 1967. A Report on a Proposed Adirondack Mountains National Park. New York: Laurance S. Rockefeller.

⁶⁰ Ethan Carr. (2000) "Taking Stock: Changing Ideas and Visions for Parks-Park, Forest, and Wilderness" *The George Wright Forum* 17, (2), Denver, CO, p. 26.

Park.” (Dave Gibson, personal communication, July 16, 2015) This is almost a full-scale reversal of the position taken by the Association back in 1967, and it is reflective of the larger convergence of attitudes of environmental groups.

The logic that federal management authority offers more protections than state and local management authority is something that has received considerable debate over the years. Even some of the groups who opposed the National Park proposal, quietly contemplated in private, benefits of more regulatory authority. Van Valkenburgh wrote in 1970, “Regulatory authority will be most useful in protecting lands located near areas identified as having a high resource and recreation potential”⁶¹. R. Watson Pomeroy echoed this point. Pomeroy stated on September 7, 1967 “the problem concerning the proper development and use of private lands is what I see as a great challenge.” Although opposed to the National Park proposal, he conceded “Much good can come of the national park proposal if it spurs action to encourage private land use in keeping with the beautiful endowment of nature.”⁶² In light of the progress made on the part of the NPS, advancements on the part of environmental groups, and management precedents instituted across the country, the Adirondack Park would certainly benefit from a discussion of a stronger and closer partnership with the federal government.

Both the Rockefeller and Cuomo Commission reports have inadvertently borrowed many of the recommendations more akin to what is demonstrated by the NPS, without explicitly acknowledging the need for an NPS takeover, like the idea of a Park Service that would provide for visitor interpretive resources, standardized information signs, or even incorporation of the State’s Wild, Scenic, and Recreational Rivers System into the NPS. All in all, this is a vindication that the 1990 recommendations should serve as the latest springboard for envisioning federal management models and approaches. A

⁶¹ Van Valkenburgh, Norman. 1979. *The Adirondack Forest Preserve*, The Adirondack Museum, Blue Mountain Lake, N.Y.

⁶² R. Watson Pomeroy. 1967. Talk by R. Watson Pomeroy, Tupper Lake, N.Y., September 7, 1967.

letter from Ben Thompson, who was involved in drafting a State Report on the Adirondack National Park proposal, back in 1967, to Tom Cobb dated August 18th 1992, is significant as it links the two historical planning documents together, and stated his “fervent hope that most of the plan will be accepted by the public and carried out”⁶³

Conclusion

The 1967 National Park proposal has left an indelible legacy in terms of serving as an anchor towards any discussion of an expanded NPS role in the Adirondack Park. Believers of an expanded federal role often lament at the missed opportunity of 1967, which already established that the Adirondack Park was a nationally significant region. Tom Cobb recalls Conrad Wirth saying even in 1990 “If the Adirondack Park was made a National Park, it would be second to none.”⁶⁴ Having an NPS designated role is a status only bestowed upon careful identification, and a privilege that has allowed many parks to achieve something greater. This has always been central to the NPS mission and to push away against an NPS role would be equivalent to ignoring the facts. As my extensive research and interview demonstrates, a discussion of a federal role in the Adirondack Park would not hurt, but help. As Cobb noted, such a discussion “will always have a valid potential.” The purpose of this paper is to revitalize a discussion that needs to be discussed, yet has largely ebbed since 1990. The 1990 recommendations and technical reports made it abundantly clear that the park has been managed under a much more precarious footing than in 1967. All too often worthy park goals of the past have been too easily given up such as the grand unbroken domain concept, even as park planners continue to think of ways to restore such visions . The following recommendations have to be made. Firstly, the Park should start off by implementing the least contentious 1990 Recommendations such as visitor services.

⁶³ Ben Thompson to Thomas Cobb. Letter. August 18, 1992.

⁶⁴ Tom Cobb, e-mail message to author, July 18, 2015

Secondly, one or more indirect NPS partnership models should be incorporated within the management framework. Over time, the NPS should take the driver's seat as they consider blending in these types of alternative management approaches within the traditional NPS model of a National Park or a National Recreation Area. To not take the time to at least consider strengthening our current management policies would risk the Adirondack Park be returned to a pre-1967 state where rules and regulations were almost non-existent save for a sign law, a park that existed only on paper.

Research Limitations and Reflections

Temporal and interpretive limitations reduced the depth of study. I came into this eight-week fellowship with little knowledge of the Adirondacks, yet desire to integrate significant events to a single piece of research—these forces left me wavering over a topic question for the first two weeks. Upon establishing a research question, I began to struggle at grasping the forest industry's connection to the National Park proposal and its management ideals. Because analyzing the forestry sector would also require analyzing its various other diverse industries that fall under this umbrella, such as pulpwood, hardwood, and sapwood extraction, in the interest of time, I decided to cut this discussion from my paper. Although the research project met my objectives, there were additional unavoidable research constraints. Most of my eight-week fellowship was spent analyzing primary source materials from the 1960's and linking relevant parallels to the 1990 Commission of the Adirondacks in the 21st Century. By drawing heavily on 1990 documents, the judgment could be made that the sources I used to draw conclusions for my research were dated. While I accept this judgment, the primary objective of this research fellowship was to utilize relevant collections from the Adirondack Research Library at Union College as much as possible. I have taken steps to mitigate reliance on dated sources through communication with David Gibson and Thomas Cobb, and reference to recent secondary sources and peer-reviewed journal articles from the Adirondack Journal of Environmental Studies. The overall

management problems in the Adirondack Park remain unchanged. The cultural and schematic headwinds against National Park Service management were relevant both before and after 1990. These constants ensure the viability of my research project.

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