



Board of Directors

Charles Clusen
Chair

Barbara Rottier
James McMartin Long
Vice-Chairs

Chris Walsh
Secretary

David Quinn
Treasurer

Nancy Bernstein
John Caffry
Andy Coney
Dean Cook
James C. Dawson
Lorraine Duvall
Robert Glennon
Roger Gray
Evelyn Greene
Sidney Harring
Sheila Hutt
Patricia Morrison
John Nemjo
Peter O'Shea
Philip Terrie
Michael Wilson

Staff

Claudia K. Braymer
Executive Director

Christopher Amato, Esq.
*Conservation Director
and Counsel*

Peter Bauer
Fundraising Coordinator

Via Email

January 27, 2025

Jason Drobnack
Division of Lands & Forests
Attn: Jason Drobnack, Lands & Forests 5th Floor
625 Broadway
Albany, NY 12233-7254

**RE: Proposed Amendments to Forest Tax Regulations
6 NYCRR Part 199**

Dear Mr. Drobnack:

Protect the Adirondacks ("PROTECT") is pleased to submit these comments regarding proposed amendments by the Department of Environmental Conservation ("DEC") to the regulations implementing the forest tax law, Real Property Tax Law § 480-a. The proposed amendments seek to improve the Forest Tax Law program by lessening the administrative burdens placed on participants and DEC staff and strengthening the sustainable forest management standards. PROTECT supports and appreciates DEC's efforts to clarify and streamline the Section 480-a program. Our comments regarding specific proposed changes are set forth below.

Definitions (Part 199.1): PROTECT supports the changes to the definitions of "forester," "forest land," "high grading," and "stand." PROTECT strongly supports the exclusion of maple sap and carbon credits from the definition of "merchantable forest crop."

General certification provisions (Part 199.5): PROTECT supports the proposed changes to these provisions.

General management plan provisions (Part 199.6): PROTECT supports the proposed changes to these provisions but suggests that the form and format of management plans, as referenced in the proposed amendments, be provided for public comment.

Implementation (Part 199.7): PROTECT supports the proposed changes to these provisions.

Protect the Adirondacks

PO Box 48, North Creek, NY 12853 518.251.2700

www.protectadks.org info@protectadks.org

Like Us on Facebook and on Instagram/Threads @ProtectAdkPark

PROTECT supports the proposed change to Part 199.8(c).

New subdivision Part 199.8(e): PROTECT supports this new subdivision.

Amendments and updates (Part 199.9): PROTECT **opposes** the proposal to change the required period for submission of amended plans from five years to ten years. A ten-year period is too long to adequately document on-the-ground changes to forest lands that may affect a management plan. For the same reason, although PROTECT supports the proposal for required submission of a status and activity report, PROTECT **opposes** the proposal that such reports be submitted every ten years and urges DEC to require submission of the reports every five years and that the status report be prepared by a forester who has visited the subject forest lands in order to adequately document on-the-ground changes that may affect a management plan.

Revocation (Part 199.10): PROTECT supports the proposed changes to this section.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on DEC's proposed amendments to the regulations implementing Real Property Tax Law § 480-a.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", with a stylized flourish at the end.

Christopher Amato
Conservation Director and Counsel