Testimony of the Adirondack Council at the
Joint Legislative Public Hearing on the Environmental Conservation
Portion of the 2018-2019 Executive Budget Proposal

February 7, 2018

Good afternoon Chairwoman Young, Chairwoman Weinstein and honored legislators. My name is Kevin Chlad, and I am the Director of Government Relations for the Adirondack Council. The Adirondack Council is a 501 (c) 3 not-for-profit organization dedicated to ensuring the ecological integrity and wild character of the Adirondack Park. We envision an Adirondack Park with clean water and air, healthy and abundant wildlife and large wilderness areas, surrounded by working farms and forests and vibrant communities. We do not accept any public funding. We offer the following testimony in response to the Governor’s proposed Executive Budget.

About the Adirondack Park
The Adirondack Park is a National Treasure, and we have it right here, in upstate New York. At 6.1 million acres, it is the largest park in the contiguous United States. The park is a patchwork quilt of public and private lands, with slightly more than half in private ownership and slightly less than half consisting of ‘forever wild’ Forest Preserve, protected by our state’s constitution. With over 2,800 lakes and ponds, and 1,500 miles of rivers that are fed by an estimated 30,000 miles of brooks and streams, the Adirondacks are an important source of clean water and a refuge for wildlife. With roughly 130,000 year-round residents in more than 100 communities, the park is a source of business and culture as well: arts, craft making, sports, hunting and fishing, farming, forestry and other entrepreneurial efforts merge with the park’s spectacular setting to create a place that is truly special.

We have many successes to cheer in the Adirondacks: a Health and Safety Land Account Constitutional Amendment to Article XIV, the completion of the second largest addition of land to the Forest Preserve since its creation, overwhelming numbers of tourists visiting our public lands, water infrastructure grants for communities in need, and much more; but those successes are threatened by ongoing and emerging threats which we will address in our testimony.
Forest Preserve Tax Payments
State-owned Forest Preserve lands in the Adirondacks and Catskills are taxed to reflect a benefit to a significant portion of the citizenry beyond the local level. That comes in the way of clean water and air, recreation, greenhouse gas sequestration and resiliency in the face of a changing climate. The Executive Budget proposal would change the state’s property tax payments to local governments that host state Forest Preserve lands. Instead of paying ‘ad valorem’ property taxes to Adirondack Park towns, counties, schools, fire and emergency response districts, the state would make payments-in-lieu-of-taxes subject to a maximum annual increase of 2 percent. We are concerned with the proposal and its potential to create fiscal constraints in out years.

Empire Forests for the Future
Private lands managed for forestry have diversified our Adirondacks Forests with younger patches than what lie on our ‘forever wild’ lands. These lands are critically important when it comes to supporting moose and a wide variety of birds and small game. They also contribute greatly to the New York State economy. Holding large tracts of land can prove challenging when property taxes and land management expenses add up. Private forests protect clean water and air, provide a refuge for wildlife, and aid in making our state more resilient to the effects of climate change. Various strategies and incentives provide hope that private forests can avoid fragmentation and associated impacts.

On more than 700,000 acres of private forestlands in the park, New York State has purchased conservation easements. While each easement is different, the state typically retires the landowner’s right to subdivide and develop, while providing new and unique public recreation opportunities and protecting sensitive resources. When the state acquires various rights associated with the land, the assessment of the land in which the private owner needs to pay taxes is reduced, increasing the likelihood that the land will remain intact.

Also, private forests in the Adirondacks support local economies by offering private recreational activities that are less conducive to the sensitive resources of the Forest Preserve, such as various motorized activities and leasing of recreational camps. These experiences are unique in that people can find guaranteed solitude through leasing the exclusive right to use lands for hunting, camping and other recreational purposes. This leasing can also generate revenue for property owners to help offset the challenges of property taxes.

We are thrilled to see that the Governor has included the long-desired Empire Forests for the Future Initiative (EFFI) forest tax law amendments. Forest tax incentives have a long history in our state, and have served as a critical tool when it comes to keeping forest lands
intact. Forest tax incentives have also supported the continuation of a forest products industry in our state, keeping our private forests young and productive while contributing to the economy.

The Governor seeks to reform the current Real Property Tax Law Section 480(a) and create a new 480(b). Under the revised program, 480(a) participants would have the option to stay in their current program or jump to the new 480(b) program, which provides two new enrollment options. By moving to the new “forest certification” program, participants would see an 80% reduction change to a 70% reduction, but they would no longer be required to submit a forest management plan with the state. To enroll in this program, participants must be certified by an approved third party forest certification. The Governor’s proposed legislation would require the Department of Environmental Conservation (DEC) to promulgate regulations in selecting the third party certification programs that a landowner could be enrolled in to qualify for a ‘certificate of eligibility’. The Adirondack Council believes that for this change to be effective, a ‘certificate of eligibility’ should only be provided to landowners if their lands are certified by the Forest Stewardship Council (FSC) or the Sustainable Forestry Initiative (SFI) as other programs fall way short of the kind of best management practices that our New York forests deserve. The American Tree Farm certification is not strong enough to be permitted as a qualifying third party certification.

The second of the new enrollment options would provide a 40% property tax reduction through the submission of a forest management practice plan, which would not require third party certification, and also provides new opportunities for wildlife habitat management incentives. We applaud this option, which enables landowners that cannot afford the costs of third party certification to enroll, and expands the program to allow for additional lands to be managed for wildlife habitat. The new 480(b) also offers a reduced minimum acreage (25 acres, as compared to 50 acres in 480(a) and the new 480(b) ‘forest certification’ option), which is expected to increase enrollment across the state. For communities that experience a tax shift of one percent or greater, the state will provide reimbursement. Without this reimbursement model or a better model, the Adirondack Council would not support the approval of this program in the final budget.

The proposal also would establish a state procurement preference for New York wood products. We applaud this gesture of support, and would emphasize that if biomass procurement will be part of this procurement, the Adirondack Council supports biomass energy production when it is climate neutral or better. We hope that Governor Cuomo and the legislature support that policy too, as we work together to achieve the Governor’s climate change commitments for New York State.

The Adirondack Council supports the Empire Forest for the Future Initiative and urges its approval this year. That being said, for New York to be a leader in forestry, the
Adirondack Park needs to be a leader in forestry, and updates to the Adirondack Park Agency’s (APA) oversight of forestry are long overdue. Adirondack issues are statewide issues. That is why the APA was created in the 1970’s, and why the state created the Adirondack Park over 125 years ago. Since 2013, the Adirondack Park Agency has approved more than 5,000 acres worth of clear cuts in 23 permits. The rate of permit approvals has increased on an annual basis since that time as well. Those who own and manage the private forests of the Adirondacks are stewards of their lands in the truest sense, and should be commended for that. There are cumulative and aesthetic impacts that should be considered on these lands, and recent efforts to discuss much needed regulatory reforms at the Adirondack Park Agency have stalled. Ultimately, the goal of forest tax law reforms and increased state tax payer subsidy for those who retain healthy forests, protecting water, wildlife and open space, should be the protection of the resources of the land. Improved modern incentives for healthy forest management, that don’t inadvertently create new incentives for clear cutting, are something everyone should support.

Furthermore, as it was mentioned earlier, many of the large commercial timber companies that are currently enrolled in 480 and 480(a) lease portions of their property for recreation, like hunting and fishing. Recreational leasing is an important source of revenue for these landowners, and this activity is considered to be a “compatible use” under the law, as it should be.

However, the lack of oversight of the siting of roads and the construction of hunting cabins could lead to negative impacts to water quality and other natural resources of the land. Currently, neither the DEC nor the APA review impacts of leasing as part of the landowner’s management plans. The APA only has scant authority to regulate forest road construction, and the DEC has authority under 480(a) to regulate the siting of roads and structures, but has chosen not to exercise it.

The Adirondack Council suggests that consideration of be given to the new program to require that participating owners of lands where the state holds protective conservation easements who lease their property for recreation and develop roads and camps should submit a siting plan to the DEC that shows the location of existing roadways and recreational leased cabins or otherwise confirms appropriate setbacks from water and sensitive resources. If the DEC and/or the APA approve siting plans prior to the construction of any new roads or cabins, they could ensure that such construction has minimal impact on the environment.

Environmental Protection Fund

We urge the legislature to approve a $300 million Environmental Protection Fund (EPF) once again for the 2017-18 fiscal year. The EPF is the cornerstone of capital funding for New York’s environment, supporting efforts to protect open space, provide clean water, and support vibrant communities and their working farms and forests. A study by the Trust for Public Land
found that for every $1 invested by New York State in the EPF, $7 in economic benefits are returned to communities. The EPF enables community-based efforts to implement programs that will make New York an attractive and healthy place for businesses to locate, and for families to live.

We applaud the state’s continued increases in annual EPF disbursements, which demonstrate both the overwhelming demand for this funding, as well as the state’s ongoing commitment to protecting our environment. As you consider the breakout of the EPF this year, we would like to bring your attention to a number of funding lines that are in the Executive Budget proposal, as well as a few that are not:

**Adirondack Lakes Survey Corps**

The ALSC was established in 1983 “to monitor changes to natural ecosystems of the Adirondack Mountains with a focus on water quality, atmospheric deposition, fish surveys, and other biological and chemical studies for the benefit of regulatory agencies and the general public.” ALSC’s primary goal is to undertake comprehensive surveys of Adirondack waters related to water quality and the effects of acid rain.

In 1984, the ALSC launched what has become widely known as its flagship project, the Adirondack Lakes Survey (ALS). The ALS surveyed 1469 lakes, including examples of every hydrological class; gathered enough physical and chemical data to classify every lake it studied; and did a semi-quantitative fishery survey of each lake. It is the only Adirondack survey, before or since, that has surveyed this many lakes and characterized them this thoroughly, and one of the only surveys anywhere to do parallel biological, physical, and chemical surveys on about half the lakes in a region of six-million acres.

Data collected and analyzed by the ALSC has been, and continues to be, critically important for the development of both State and Federal policies on emission control and air transport regulations. ALSC research on acid rain and transboundary air pollution has been cited repeatedly in federal and state legislation, regulatory actions, testimony to the U.S. Supreme Court, and numerous scholarly journals, articles and books.

The ALSC is a 501(c)(3) and its efforts have been financially supported by the United States Environmental Protection Agency, NYS Department of Environmental Conservation DEC and the NYS Energy Research and Development Authority. The future work of the ALSC is now at great risk.

The Adirondacks are located directly downwind from major Midwest coal-burning power generators, which emit sulfur dioxide and nitrogen oxides, the major precursors of acid rain having caused harm to many Adirondack lakes and ponds for decades. Several decades ago, the impact of acid rain and cross-state air pollution on the Adirondacks caused significant
harm to New York’s lakes, resulting in the loss of trout and loon populations and severely harming forest health. Following the enactment of the Clean Air Act Amendments (CAAA) of 1990, the ALSC initiated work on Adirondack lake, pond, soil and stream monitoring, wet deposition monitoring, fish surveys and cloud monitoring on Whiteface Mountain.

ALSC’s monitoring and testing program has worked to ensure that the CAAA requirements for the mitigation of acid rain impacts are successful. ALSC has safeguarded the work on the Adirondack lakes now recovering from acid deposition – resulting in new opportunities to restore trout and loons to Adirondack waters.

ALSC’s work has informed environmental policy decisions, utilizing independently researched scientific data benefitting all New Yorkers. The long-term monitoring efforts of the ALSC has served as a watchdog over polluters and has provided necessary oversight for enforcement. Because of the ALSC’s research, emission impacts have been greatly reduced. Recovery, while not yet complete, has made measurable gains.

In 2017, the operating budget for the ALSC was approximately $700,000, with the New York State Research and Development Authority (NYSERDA) being the primary funding source (over $450,000). DEC also provides in-kind support totaling approximately $350,000 annually. NYSERDA has significantly reduced its support of ALSC, placing the organization’s work and legacy in peril, save for a recent award to conduct future long-term monitoring at a much-reduced level. All eight full-time employees of the ALSC were notified in early November of their termination, effective December 29, 2017. The frequency of Adirondack lake monitoring would be cut by nearly two-thirds, from 800 samplings each year to only 300.

The careers and employment of the eight uniquely experienced ALSC staff in Ray Brook, and the sampling and research they conducted, are now in jeopardy. Without any immediate intervention by New York State stakeholders, the ongoing work of ALSC and its long term monitoring effort is imperiled.

The timing couldn’t be worse, as the U.S. Environmental Protection Agency (EPA) moves to repeal the federal Clean Power Plan and the U.S. Department of Energy is reviewing plans to subsidize coal plants to make them more competitive in the market place. This is an enormous setback for the U.S. These actions will have negative impacts on the Adirondacks, as progress on significant reductions in acid rain over the past 20 years may be lost.

ALSC is now working to secure more stable funding to continue and expand the important work in reducing the impacts of Acid Rain, protecting our slowly recovering fisheries, native loons and forest health.
We request your support to establish the “21st Century Adirondack Lakes Survey,” plan for a new survey to commence in 2019 and provide policymakers with over 40 years of data. In partnership with local colleges, ALSC anticipates including additional chemical and invasive species measurements as well as wildlife observations.

**Adirondack Diversity Initiative**
The Adirondack Park continues to suffer from multiple countervailing forces, which, if left unchecked, could further harm regional socioeconomic and cultural development. Largely rural, white, and laced with vast pockets of poverty, the Park finds itself in a compromised position. Facing a higher than average median age (8 years older than NYS), declining school enrollment and overall population decline the future of the Park is in jeopardy.

To ensure the longevity and sustainability of the Park and make the Adirondacks a more welcoming and inclusive community, the Adirondack Council is advocating for a $100,000 appropriation in the Environmental Protection Fund for the $250,000 Adirondack Diversity Initiative. Funding for this initiative would support efforts to conduct six diversity training sessions per year, grow the number of affiliate groups from twenty to thirty within two years or less, increase the visitation and diversity of visitors fivefold and conduct six presentations at local chamber of commerce meetings in the next year.

**State Land Stewardship and Wilderness-Based Management**
The State Land Stewardship (SLS) budget line is an essential funding source which makes it possible for New Yorkers to more fully and safely enjoy our public lands and parks. SLS funding supports professional trail crews, summit stewards, Student Conservation Association work, and the construction and maintenance of the state facilities and recreational infrastructure that act as an economic driver in much of the state. The SLS projects permit the public to enjoy safe use of state parks and other public lands, and supports sanctioned lean-to rehabilitation, parking lots, trail signs, bridges and many other access-related duties that enable the Forest Preserve to continue to be the natural resource and economic driver that it is. **We appreciate and support the Executive proposal to increase this line to $34.138 million this year, and urge the legislature to accept this appropriation.**

While we support this appropriation, we urge the Governor and Legislature to dedicate funds to wilderness-based management for Adirondack Forest Preserve lands. Forest Preserve lands that are classified as “Wilderness” pursuant to the Adirondack Park State Land Master Plan are largely managed using non-motorized/ non-mechanized techniques. While Wilderness stewardship can mean that more handwork and primitive techniques are employed, the intangible rewards are priceless. Under Governor Cuomo’s leadership, the Adirondack Park Agency just approved the historic classification of the Boreas ponds tract, providing a
compromise that has been applauded by environmental groups and local governments. The Governor’s APA recommended adding 25,000 acres of new Wilderness, creating a new close to 275,000 acre Wilderness area, which is the largest in the Northeast. At a size that is larger than Rocky Mountain National Park and twice the size of Zion National Park, Governor Cuomo has created a national attraction that will provide a gift to generations yet unborn and an economic asset to the ‘gateway’ communities.

Already, we are experiencing great challenges with the overuse of our state lands. While news stories have highlighted busy weekends in which Cascade Mountain in the Adirondack High Peaks Wilderness hosted more than 1,000 hikers on its summit and cars parked along road shoulders for miles, this problem is far more widespread than a couple of hot spots in that region. The overuse trend is a challenge on other state lands across the Adirondacks and Catskills, and is also occurring nationally in our federal park system. When it comes to addressing overuse and providing Wilderness-based management, New York State has room to grow. With staffing shortages at the DEC, and increasing constraints on the resources that support their management efforts, the incredibly talented and hard-working state lands staff are stretched incredibly thin. Dedicated stewardship funding for Wilderness-based management is needed to protect this threat to recent successes in promoting tourism in the Adirondack region. We urge the Governor and Legislature to fund a High Peaks Wild Lands Complex Planning effort that is truly aspirational, that welcomes a diverse array of stakeholders and wilderness management experts, local businesses and local governments.

SUNY ESF and Paul Smith’s College Visitor’s Interpretive Centers
We applaud the inclusion of $180,000 for Paul Smith’s College and $120,000 for the SUNY School of Environmental Science and Forestry, in the Governor’s Executive Budget proposal in support of their management of the Adirondack Visitor’s Interpretive Centers (VIC). While previously owned and operated by the state, these educational institutions took over the management of these facilities at a time when the state’s coffers could not support this vital resource to residents and visitors alike. The VICs offer roughly 30 miles of trails, including more than 9 miles of interpretive nature trails, showcasing the natural beauty of the Adirondack Mountains and providing unparalleled opportunities to view, hear, photograph, and enjoy nature. Many of the trails are surfaced for easy walking, and have trail-side signs explaining natural and man-made features of the landscape. The trail systems traverse every habitat type found in the Adirondack Park (with the exception of alpine vegetation) and include extensive boardwalks through wetland ecosystems. The Paul Smith’s VIC has also developed a maple sugaring operation and participates in the New York State Maple Producers Association's Maple Weekends during the spring sugaring season. With more imminent financial pressures facing each of these educational institutions, the success of the VICs are once again threatened. We urge the legislature to accept the Executive budget proposal to fund the Adirondack VICs in the EPF.
Wastewater Treatment Plants in the Adirondacks – Status of Compliance and Operational Needs

Recent years have brought great attention to New York State’s challenges with failing and degrading water treatment infrastructure. Failure of sewage treatment plants and their collection systems impairs their ability to properly treat locally generated wastewater. The impacts can be far reaching – from closing beaches to impairing pristine trout streams to threatening drinking water resources. The challenges local Adirondack governments face to take on these needs are enormous from a technical and operational basis as well a fiscal one. It’s sometimes impossible to raise the local revenues necessary with a limited tax base.

In November 2016, the Adirondack Council released a report entitled Clean Water Infrastructure in the Adirondack Park: Crisis or Opportunity. The report highlighted the need for wastewater treatment plant upgrades, retrofits and/or repairs to continue to protect Adirondack waters. The Adirondack Council’s report found that over $100 million dollars of clean water infrastructure projects were needed at 22 facilities in the Park including wastewater treatment plants and the sewer lines connected to them. Statewide need in wastewater treatment and infrastructure upgrades and/or repairs is close to $40 billion over the next twenty years. In response to this growing need and recognizing that these communities cannot do it on their own, you and your colleagues in the legislature worked with Governor Cuomo in April 2017 to authorize a $2.5 billion Clean Water Program over the next five years in state grant funds to help finance wastewater and drinking water capital projects in New York State as well as other related clean water initiatives. In years prior to this historic appropriation, your work with the Governor resulted in hundreds of millions of dollars in infrastructure investments for clean water grants as well. We are very grateful for your commitment to clean water funding and applaud your persistence, which recognizes that we have a long road ahead of us as we begin to tackle this project backlog.

In November of 2017, the Adirondack Council released a second report, Wastewater Treatment Plants in the Adirondacks: Status of Compliance and Operational Needs, as a technical follow-up to our initial needs assessment in 2016. This new report celebrates the progress made and looks at compliance and operational issues communities face as well as further capital infrastructure funds that must be raised. The report categorizes each of the wastewater treatment plants in the communities within the Park based on their compliance with regulations of the Clean Water Act under the DEC State Pollution Discharge Elimination System (SPDES) permit program, consent orders that are currently in place and emerging issues certain facilities are facing.

Already, after three successful rounds of funding awards, New York State has invested over $38 million in clean water infrastructure needs to communities in the Adirondack Park including recent grants from NYSDEC’s WQIP program. Even with this welcomed investment, more needs remain. Even with these grants and their financing from the Federal State Revolving Loan Fund administered by NYSEFC, this report has identified over $85 million
($85,599,491) in further wastewater treatment and sanitary sewer system project costs for Adirondack communities. In addition, some communities are still in the process of identifying their estimated project costs for additional work needed at their facilities which will increase this total. Many rural communities in the Adirondacks are challenged to invest in engineering designs for their wastewater treatment plant systems and complete the application process in order to receive state grant funds to begin making the necessary repairs and/or build new treatment systems.

The information gathered in the report represents a definitive scope of the current state of affairs with wastewater treatment plants and sanitary sewer systems in the Adirondacks. The findings show that significant needs both in the short term and the long term for communities still remain. Facilities and sewer systems are stressed and with age they are breaking down. In order to secure continued success for clean water in the Adirondacks, more will need to be done. Already, many local governments are positioned to apply for the next round of grants in 2018 and will hopefully receive future funds to reduce their local burden. The Adirondack Council will continue its efforts to reach out to local communities to support their efforts so more clean water grants can come to the Adirondacks. Now is clearly the time for all of us to work in partnership to secure the necessary funds needed to properly protect the water resources of the Adirondack Park.

We applaud the Governor and Legislature for making the historic $2.5 billion clean water infrastructure appropriation that makes this recovery effort possible, and we are excited to see how the Adirondacks will fare in the next round of grant disbursements. With so much work left to do, we thank the Governor for continuing the rollout of the $2.5 billion appropriation made last year in his 2018-19 budget proposal, and urge the legislature to support that continuation.

Olympic Regional Development Authority
We support the executive budget proposal includes $62.5 million in new capital funding for the Olympic Regional Development Authority, including $50 million for an upgrades at Olympic facilities and ski resorts in an effort to lure the World University Games; $10 million for maintenance and energy-efficiency projects; and $2.5 million appropriated from the Office of Parks, Recreation and Historic Preservation (OPRHP) budget as part of the New York Works initiative.
Department of Environmental Conservation

The Executive Budget proposal does not offer any material increases for DEC staffing at this time, but also does not cut staffing in a difficult budget year. The DEC faces serious difficulties in their ability to effectively follow their mandates with permitting, enforcement, land management, and air and water quality monitoring. With important new laws and regulations such as the Sewage Pollution Right to Know Act, the Invasive Species Prevention Act, water withdrawal reporting, and the added responsibility of a recent 6-year 65,000 acre land acquisition in the Adirondacks, the DEC’s job necessarily grows in its efforts to conserve, improve and protect New York's natural resources, health and environment. Not only is the DEC working hard to promulgate and enforce new regulations, but they are expected to keep timelines with their permitting processes. Cutting regulations that protect public health, recreation and forest products-based economies, will cost exponentially more in the long run, making their duties absolutely essential.

State lands staff at the DEC Central and Regional offices are unsung heroes in the conservation of our public lands. They deserve great recognition for their hard work in the recent acquisition of 65,000 acres of land in fee and the protection of another 93,000 acres as working forests. With a lean staff and lean resources, they just completed the second largest addition of land to the Forest Preserve since the creation of the Forest Preserve. But their work will continue: a unit management planning process is needed following the classification of the Boreas ponds by the APA, and continuing stewardship and planning efforts have them overburdened, undercutting their ability to provide truly aspirational stewardship of the Forest Preserve. We call upon the Legislature to look at the current staffing at the DEC, including Lands and Forests and other priority environmental positions to find ways to ease the incredible burden they shoulder. Forest Rangers and Environmental Conservation Officers (ECOs) engage daily with the public and oversee our natural resource assets, enforcing our regulations and educating the public. The Forest Ranger force is responsible for managing roughly 5-million acres of state land in New York. They have jurisdiction over incredibly large swaths of territory, requiring highly specialized equipment and training. Considering this, their impact is unparalleled when it comes to educating, protecting and, more often than most realize, rescuing those who enjoy state land and the Forest Preserve. Nearly half of the NYS Rangers are scheduled to retire in the next 5 years, creating a frightening situation that involves a tremendous loss of institutional knowledge and a potential reduction in public safety and environmental protection. We call upon the Legislature to find ways to expand Ranger Academies, succession planning and hiring for Rangers, ECOs and the rest of the department to match increased land ownership and expanded staff responsibilities.
Adirondack Park Agency (APA)

Eight years ago, the APA had a staff of 72. **This year, the Agency has 54 employees and the Executive Budget does not propose to increase that number.** We have real concerns that the current staff will not be able to carry out the Agency’s functions, such as site visits and permit reviews, community and applicant outreach and proactive enforcement of regulations. Without being able to replace critical positions, the APA will continue to face difficulties keeping up with permit timelines and will lack the resources to incentivize compliance with their regulations.

The APA is one of our smallest state agency, but carries a mission the Legislature established as vital for the entire state – *the protection and preservation of the natural resources and wildness of the Adirondack Park*. **We request that two additional staff be added to the Adirondack Park Agency (APA), to enhance the rate of permit review, improve permit compliance assistance and to ensure that permit applicants receive a thorough and timely review of their proposed project.**

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