PROTECT THE ADIRONDACKS!

September 29, 2017

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PO Box 99
Ray Brook, NY 12977

RE: Public comments on draft APA-DEC "Management Guidance: Siting, Construction and Maintenance of Singletrack Bike Trails on the Forest Preserve in the Adirondack Park"

Dear Kathy,

These comments are submitted as part of the public comment period for the new draft "Management Guidance: Siting, Construction and Maintenance of Singletrack Bike Trails on the Forest Preserve in the Adirondack Park" (Guidance) promulgated by the Adirondack Park Agency (APA). This document seeks to create a uniform management process for locating, building and maintaining networks of mountain bike trails in the Adirondack Forest Preserve. Though mountain bikes have been used in the Forest Preserve since the 1980s, the major policy direction provided by the APA has been the prohibition of their use in Wilderness areas. Since then, mountain bike advocates have prevailed in their advocacy for the designation and construction of more separate and specially designed mountain bike trail systems. The first was in the Wilmington Wild Forest area and recent Unit Management Plans and amendments have seen new systems proposed or approved in the Moose River Plains and Saranac Lake Wild Forest areas. Mountain bike use is increasing in popularity and now the state is wisely undertaking a proactive management approach to facilitate the growing interest by the public in this recreational activity.

While the mountain bike trails in the Wilmington Wild Forest have seen high numbers of users, both in the older "Flume" trail network and the newer "Hardy Road" trail network, the challenge for state planners will come from new efforts to build mountain bike trail networks in areas of the Adirondack Park that are both less populated and less visited. For instance, the state is taking a build-it-and-they-will-come approach with the recent new mountain bike trail networks approved in the Moose River Plains Wild Forest area outside of the Eighth Lake Campground.

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Overall, the mountain biking Guidance is an effort to provide public and accountable direction to state planners for expanding and maintaining a mountain bike trail system on the Forest Preserve. This follows a guidance document prepared for snowmobile trails and nascent efforts for guidance documents on cross-country ski trails and open tree (powder? backcountry?) ski trails. Though "Guidance" documents are approved as official policy of state agencies, they are not law, and as we have seen with the snowmobile trail guidance, they are easily subverted and ignored when deemed necessary or convenient for state agencies to do so. The core provisions in the snowmobile trail guidance against building trails through interior areas of the Forest Preserve, building redundant trails, and minimizing negative impacts such as extenisve trail grading and bench cutting with heavy machinery, to name a few things, are all provissions that have all been openly ignored by the APA Board and staff. We certainly hope that the APA Board, as it takes up this new mountain bike trail Guidance, will redouble its commitment to live within the boundary lines of the new public policy that it creates.

General Comments

The Adirondack Forest Preserve is now fully in the throes of a new era where it is being managed primarily for recreational use, not for natural resource protection. A major part of the heightened focus on recreational use is the development of abundant and separate trail systems for various recreational uses: hiking trails (foot trails), snowmobile trails, horse trails, mountain biking, and roads being the dominant trail systems/networks. There is also an active clamor for a new recognized and formally managed "open tree skiing" trail network, which presumably will see its own guidance document some day. Each of these recreational pursuits has distinct trail systems with different designs, construction techniques, and maintenance issues. In many ways, what we're seeing today is a major experiment in outdoor recreational management with the results far from known.

The Guidance devotes a great deal of energy and thought to something it calls the "multiple (shared) use" trail that it defines as "A trail that permits more than one type of use." No such thing as a "multiple use trail" or "shared trail" is defined in the Adirondack Park State Land Master Plan. The Guidance would be improved by making reference only to the types of trails that are defined and approved in the SLMP.

The concept of the multiple use trail is central to the Guidance. A multi-use trail as used by the Guidance is a trail that is designed to facilitate a series of different recreational uses. Hence, a snowmobile trail is also a hiking trail, a bike trail, a horse trail, etc., or vice versa. While the APA and Department of Environmental Conservation (DEC) have embraced multiple use trails as a core concept, and approved them in recent UMPs, they're a myth in both reality and practice.

Multiple use trails are a myth because such trails are actually designed for one specific activity, which fundamentally undermines the trail's attractiveness or functionality for other activities. For instance, a multiple use mountain bike trail is designed with banked turns, narrow trail tread, narrow foot bridges without railings, and in compact trail networks where bikers ride in meandering loops, rather than on a trail leading to a single destination. While these trails may be useful for nearby residents as places to walk their dogs, in practice they fail as hiking trails because they

lead nowhere, fail as horse trails because they are too narrow, fail as snowmobile trails due to their basic designs, and fail as cross-country ski trails because only experts can negotiate the series of hairpin turns popular on mountain bike trails.

Another example of failed multiple use trail planning is found with "class II community connector snowmobile trails," which are regularly billed as multiple use trails. Class II trails are designed to widths of 12 feet, with all trees, both big and small, and all understory vegetation removed. Stumps are cut to ground level and all rocks, downed and decaying trees, and hummocks that protrude more than three inches are flattened. All natural pits are filled in and the trail corridor is universally flattened. Grading with heavy machinery is undertaken over long stretches and extensive bench cuts that reshape the upslope, trail tread, and downslope with manmade forms of combined widths of 15-20 feet are common. These trails often have open canopies for long stretches. At the end, oftentimes, the highly disturbed trail corridor is planted with a grass seed mix. The result is something much different than a hiking trail or a mountain bike trail. The result is a highly altered, disturbed and wide corridor through the Forest Preserve that is designed and constructed for snowmobile use, yet state agencies claim it's a multiple use trail though by its very nature and design resoundingly fails to possess any of the attributes or features desired by the hiking or mountain biking communities. As such, class II trails are stark failures in practice as multiple use trails.

It's also important to know that basic critiques about the viability of class II community connector snowmobile trails/multiple use trails are not seriously answered by state agencies. To whit, during the approval of the new class II community connector snowmobile trail from Newcomb to Minerva, we raised issues about the limited snowfall in the greater Minerva area. That part of the Adirondacks receives far less snowfall than Lake Placid and less than half of the average snowfall seen in the Old Forge area. Despite the fact that snow is a necessary ingredient for a successful class II snowmobile trail, state agencies refused to look at snowfall in official "Response" documents under the State Environmental Quality Review Act (SEQR) by stating the Newcomb to Minerva class II community connector trail was a multiple use trail and not solely a snowmobile trails. In this matter state agencies were just playing games.

The new mountain bike trail Guidance blithely continues to claim that multiple use trails are used by people for different recreational purposes. In fact, the only multiple use trails that work are designated roads on the Forest Preserve, such as the Cedar River to Limekiln Lake Road, which is used by motor vehicles for three seasons and snowmobiles in the winter. Other than this road, and other roads used the same way, there is no multiple use trail that is actually used by large numbers of people for different recreational uses in the Adirondack Forest Preserve.

The Guidance would be on more stable footing if it dispensed with the fiction of the multiple use trail. State planners should take the position that the Forest Preserve is big enough to provide different recreational infrastructures for different recreational activities, as long as they comply with Article IX, Section 1 of the NYS Constitution.

Guidance Does Not Align with the State Land Master Plan

The Guidance seeks to set formal and long-term policy for building new mountain biking trail

networks in the Forest Preserve. In many ways the Guidance, and state agencies, are undertaking activities that are explicitly directed by the State Land Master Plan.

> If there is a unifying theme to the master plan, it is that the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded. This theme is drawn not only from the Adirondack Park Agency Act … and its legislative history, but also from a century of the public's demonstrated attitude toward the forest preserve and the Adirondack Park…. (p 1)

> The enormous tracts of Forest Preserve provide a public resource for recreation in a wild setting that is unique in the eastern half of the United States and complements the more developed facilities of the excellent state park system in the rest of the state. (p 5)

These two sections show that the essentially wild Forest Preserve is the place that is supposed to complement more developed outdoor recreational facilities. Hence, the Forest Preserve was not envisioned to be used as the source and location for "more developed facilities." Such facilities, like Gore and Whiteface Mountain Ski Areas, have been developed through amendments to the Article 14 of the NYS Constitution. There is certainly an open question about whether "stacked loop" and highly concentrated mountain bike trail networks qualify as "more developed facilities."

Later, the SLMP states in the Wild Forest section: "Save for [certain notable exceptions…] the state should rely on private enterprise to develop intensive recreational facilities on private lands within the Park." (p 7) Again, there's an open question about whether these intensive recreational facilities, such as The Flume and Hardy Road mountain bike trail networks, as well as those planned for the Saranac Lake Wild Forest and Moose River Plains Wild Forest, should be directed to private land and not the Forest Preserve. There's certainly an argument that the SLMP is directing such facilities to private land, rather than the Forest Preserve.

Statement of Purpose and History of Bike Trails on the Forest Preserve

The opening paragraph in this section makes important statements:

> New York's Forest Preserve is a destination for various road and trail based cycling opportunities. This document provides guidelines solely for the management of Department of Environmental Conservation (DEC or Department) singletrack bicycle trails ("bike trails") on land classified as Wild Forest in the Adirondack Forest Preserve. It is intended to help land managers consistently design, construct and maintain bike trails and bike trail networks that protect natural resources and wild forest character while also providing a valuable recreational opportunity.

We applaud the emphasis on protecting natural resources and the wild forest character of Wild Forest areas. The sole focus of the new mountain bike trail Guidance should be to direct state planners on how locate, design, construct and maintain singletrack mountain bike trail networks

in Wild Forest areas. The sections in this Guidance on "doubletrack" trails and trails on "former woods roads" are a distraction and unnecessary.

The statement above is followed by another paragraph:

> Mountain biking opportunities on lands classified as Wild Forest, Primitive and Canoe have historically been offered on former woods roads and existing trails designed for other modes of travel. The Master Plan dictates where cycling is a conforming use on Forest Preserve lands. Mountain bikers generally prefer riding on singletrack track trails designed specifically for mountain biking. Former woods roads and multiple use trails will continue to be an important part of the Forest Preserve trail network open to bikes. However, single-track trails designed and built for mountain biking on lands classified as Wild Forest is the focus of this guidance.

This paragraph is not accurate. It uses the phrase "former woods roads." There is no definition in the SLMP for a "former woods road." The SLMP has definitions for "administrative roads," "bicycle trail," "cross country ski trail," "foot trail," "horse trail," "improved cross country ski trail," "road," and "snowmobile trail," but contains no definition for a "former woods road" or any kind of woods road. Nor does the Guidance define a "former woods road." The Guidance should be consistent with the SLMP. The Guidance should not invent new terms to allow uses or activities that are not expressly authorized in the SLMP. As such, the paragraph above must be rewritten.

The Guidance states that mountain bike trails have been routed on "former woods roads" on Forest Preserve lands classified as Wild Forest, Primitive and Canoe. We note that any classified Forest Preserve lands should have a Unit Management Plan that designates various trail or road types that comply with the SLMP. The Guidance states that "former woods roads" will continue to be an important part of the Forest Preserve trail network, but in reality they will only be so if they are designated as some form of official "trail" or "road" through the UMP process, unless the Guidance is somehow stating that off trail bushwhacking with bikes is allowable in Wild Forest areas, which does not appear to be the case.

The focus on "former woods roads" makes the Guidance incoherent. The only places where mountain bikes are allowed on the Forest Preserve is on designated roads trails.

We agree that the sole focus of this Guidance should be on specially designed singletrack mountain bike trails and suggest the following changes the to second paragraph in the Statement of Purpose to read:

> Mountain biking opportunities on lands classified as Wild Forest, Primitive and Canoe **are provided on designated roads, foot trails, snowmobile trails, and on approved administrative roads.** The Master Plan dictates where cycling is a conforming use on Forest Preserve lands. Mountain bikers generally prefer riding on singletrack track trails designed specifically for mountain biking. **Bicycle riding on designated roads, foot trails, snowmobile trails, and on approved administrative roads** will continue to be a part of the Forest Preserve trail network open to bikes. However, singletrack trails designed and built

for mountain biking on lands classified as Wild Forest is the focus of this guidance.

Further, calling dirt roads "doubletrack" trails is not accurate and is pure policy artifice. The loose stones, sand, and rough surface of most Forest Preserve roads make doubletrack riding impossible. Mountain bike riding on dirt roads in the Forest Preserve is not popular. For example, the roads opened for mountain bike riding in the Essex Chain Lakes area are hardly used. Only a handful of people who signed the register at the Essex Chain Lakes area June - August 2017 wrote they did so for mountain biking. These roads are sandy and have lots of loose stone that are neither enjoyable nor suitable for mountain bike riding. To call designated "roads" on the Forest Preserve double-track trails is disingenuous.

The Guidance makes one important acknowledgement on page 8: "using former woods roads as doubletrack bike trails requires careful evaluation of the existing conditions before opening the trail to bike use." This statement would be much more useful to state agencies and the public if it provided some criteria for undertaking the "careful consideration" and described the "existing conditions." Such an analysis was not done when the state chose to open roads for mountain biking in the Essex Chain Lakes Primitive area. Mountain bike use has been marginal in that area and as a recreational management program it has been a failure. This Guidance would be on stronger footing by focusing exclusively on the mountain bike trail networks that the public craves – singletrack trail networks – and dispense with planning for mountain bike riding on snowmobile trails and roads in Wild Forest Areas, and where allowable under a UMP on administrative roads, because this use is incidental. The sections on "doubletrack" trails should be deleted.

Picture on left above of section of Hardy Road mountain bike trail. It's very narrow with a compacted surface. On right is a dirt road in the Essex Chain Lakes area, which is characterized by a sandy surface with lots of loose stone. Mountain bike riders strongly prefer single track track trails whereas the roads on the Forest Preserve are not heavily used for mountain biking. It's important to note how different the signletrack mountain bike trail on the left is from the dirt road on the right. These types of trails provide very different experiences for riders. Overwhelmningly, mountain bike riders seek riding opportunities on specially designed singletrack trails and not on old dirt roads.

Definitions

The guidance refers to "multiple use trails." There is no such thing defined in the SLMP. The Guidance would be improved by making reference only to the types of trails that are defined and approved in the SLMP.

Delete references to "doubletrack trails." It's a fiction. It's policy artifice. It makes no sense. It distracts from the focus on singletrack trails.

Planning the Trail Network

The "Planning the Trail Network" section states an objective of providing specialized trails for mountain bikes primarily in Wild Forest areas of the Forest Preserve. The Guidance states:

> The "trail styles" and "riding opportunities" described in this section reflect the interests of mountain bikers and how they can be accommodated in a way that upholds the fundamental values of the Forest Preserve. High quality mountain biking experiences are created through the development of riding opportunities that incorporate trail styles appealling [sp] to mountain bikers.

The Guidance is clear here that its primary purpose is to establish a management system that provides appealing mountain bike riding experiences. This section lists questions it believes should be asked, and presumably answered, when plotting a new mountain bike trail network:

> Consider the following questions when evaluating a single trail or a network of trails for shared use suitability:
>
> **Who** is the trail designed for and who will be sharing it? E.g., cyclists, hikers, trail runners, equestrians, snowmobiles or skiers.
>
> **What** is the character of the trail? I.e. Are soils on the trail particularly sensitive? How are the sight lines? How fast will users typically be travelling along the trail? Are trail users all travelling in the same direction? How rough is the tread surface? Is it especially difficult for trail users to pass each other due to the terrain?
>
> **When** will the users be on the trail? E.g., at the same time, during different seasons.
>
> **Where** is the trail located? E.g., frontcountry, backcountry, Wild Forest, Intensive Use, etc.
>
> **How** often will encounters between different trail users occur, and are these encounters likely to have a negative impact on the experience that trail users expect to have?

In the "Who" questions section, the Guidance asks about shared use of the trail. This section talks about shared use between mountain bikes and equestrian uses, among other uses. It does not seem viable that horses are compatible with narrow trails with smooth surfaces, banked turns and narrow bridges. A horse using the new Hardy Road mountain bike trail network would do a

Picture above shows a specially built banked turn, known as an inslope corner, on a section of the Hardy Road mountain bike trail network in the Wilmington Wild Forest. It's hard to imagine a scenario where this trail is appropriate for shared "equestrian" uses (horse riding) and would not be damaged. This is also a feature not used on a foot trail.

lot of damage. The concept of a shared use or multiple use trail system, as written about above, is a flawed construct used by state planners.

The "What" section asks some important questions that the Guidance does not answer or provide direction to trail planners. For instance, the question **"**Are soils on the trail particularly sensitive?" is asked, yet the Guidance provides no information on the soils most conducive to supporting mountain bike riding. The question "How are the sight lines?" is asked, yet the Guidance provides no instruction on what constitutes good sight lines? The question "How fast will users typically be travelling along the trail?" is asked, yet the Guidance says nothing about speeds of mountain bikers. The question "Are trail users all travelling in the same direction?" is asked, yet the Guidance provides no direction that trail systems should be designed for 1-way traffic for mountain bikers. The question "Is it especially difficult for trail users to pass each other due to the terrain?" is asked, yet the Guidance provides no information on how riders on mountain bike trail networks pass one another on narrow trails. Is the slower rider expected to pull off the trail? Is the slower rider expected to stop and step aside? Is the faster rider expected to pass the slower rider by going off trail? Do the different mountain bike trail categories described in the "Trail Styles" section contemplate riders passing each other in different ways? What are the different underlying topography or geological conditions that make for suitable mountain bike trail networks?

The "What" section needs to be improved by asking some other questions. Among these: What are the effects on wildlife? What are the effects on forest regeneration? What are the special habitats in the area? What erosion control features are required? What is the plan for bridges in the area? What wetlands are in the area?

The “When” section questions appear incomplete. Is this section asking “When will different recreational activities be undertaken on this trail? When are user conflicts likely to occur? How will these conflicts be resolved?”

The “Where” section uses terms “frontcountry” and “backcountry.” If such terms are going to be used, they should be defined. The other question that should be asked in this section is: “Does the location comply with the Guidance location requirements for proximity to Hamlet areas and Intensive Use areas?”

The “How” section only asks about potential user conflicts. While this is an important question other questions should also be asked. How will erosion be controlled? How many bridges will be needed? How many raised bog bridges are needed? How will wetlands be impacted? How will special habits be protected?

Trail Style

This section provides direction for “singletrack” and “doubletrack” trails. We reiterate our comment above the focus on singletrack trails.

Singletrack Trails

The set widths for different singletrack trails are important to chart, but we note that many mountain bike trails experience trail creep where riding widens trails.

Doubletrack Trails

This section should be deleted. This is a Guidance about singletrack trails.

Riding Opportunities

This section should be revised to state the sole focus is on singletrack mountain bike trail networks,

Stacked Loop Network

The Guidance envisions compact mountain bike trail networks that are designed in what is called a “stacked loop network.” In these networks many miles of trails are designed in a relatively small area. In addition to the requirement for a compact network of trails, the Guidance envisions that each network will provide trails of different levels of difficulty, from easy to expert, from corresponding changes from wider trails to narrower trails.

The “Environmental Conditions” section needs work as rather than “commonly occurring habitats” for a criteria for siting mountain bike tail networks, wouldn’t it make more sense to identify the specific forest habitat types and soil types that are most conducive to providing high quality mountain bike trail networks?

The stacked loop trail networks described in the Guidance are similar to those already approved in the recent amendment to the Moose River Plains Wild Forest area and that is pending in the Saranac Lake Wild Forest Area UMP.

Long Distance Tour

To date the only successful mountain bike trails are the networks of "stacked loops" built in the Wilmington Wild Forest Area. While there is a long distance mountain bike race, the Black Fly Challenge, through the Moose River Plains, that area sees little mountain bike use outside of the race weekend and the week before. No specially built mountain bike trails have been constructed for long distance touring. Given that mountain bike use is prohibited in Wilderness areas, and must absolutely remain prohibited in Wilderness areas, the opportunities for long distance tour trails for hamlet to hamlet biking is limited without riding for long stretches on paved roads.

Given the patchwork quilt design of the Adirondack Forest Preserve, with many Wilderness and Wild Forest areas intermingled, long distance tours will likely require a change to the SLMP. Currently, the SLMP states:

> **Boundary structures and improvements and boundary marking**
>
> 1. Where a wilderness boundary abuts a public highway, the Department of Environmental Conservation will be permitted, in conformity with a duly adopted unit management plan, to locate within 500 feet from a public highway right-of-way, on a site-specific basis, trailheads, parking areas, fishing and waterway access sites, picnic areas, ranger stations or other facilities for peripheral control of public use, and, in limited instances, snowmobile trails. (p 27)

The argument could certainly be made for allowing mountain bike trails in Wilderness areas within 500 feet of a public right-of-way, the same that exists, though is seldom used, for snowmobile use. The Guidance should acknowledge the practical reality of needing to revise the SLMP to achieve long distance touring for mountain biking.

Winter Cycling

Do trails where winter cycling is envisioned need to be groomed? We have seen the "fat bikes" that the Guidance speaks about for winter use riden to Camp Santanoni using the tracks of the cross-country skiers or the snowmobile tracks from the caretakers at Camp Santanoni. The Guidance makes no statement about grooming snow on mountain bike trails, so we take it that this is not allowed. If fat bikes need a groomed trail then the only option for winter riding is on a groomed snowmobile trail.

Downhill or Free Ride Trails

These are proposed for Intensive Use areas, such as Whiteface Mountain or Gore Mountain Ski Areas. Because they are in Intensive Use and utilizing downhill ski trails we have no comments.

Guidelines for Bike Trail Design and Construction on the Forest Preserve

There are many elements to mountain bike trails that are not found in other trail systems. There are also many similarities. It's important for the Guidance to detail the areas of trail design that are unique to mountain bike trails and mountain bike trail networks.

The Guidance appears to be silent on the types of tools and machinery that is allowable to be used to build and maintain mountain bike trails. We urge that the Guidance states clearly that all work must be done with hand tools and that no heavy machinery or so-called "low impact landscaping equipment," which in reality are multi-ton excavators/bulldozers, are allowed.

Picture above shows a 10,000 pound "mini-excavator" used by the DEC. The APA Snowmobile Trail Guidance classifies this machine as "low impact landscaping equipment." The impacts from wide use of this machine, and others like it, profoundly altered class II communnity connector snowmobile trail corridors. The mountain bike Guidance is silent on the equipment that can be used to construct and maintain these trails. The Guidance should state clearly that all work done on mountain bike trails should be done with hand tools.

Trail Alignment

Trail alignment is an important part of mountain bike trail design and construction. The Guidance speaks in generalities with out any firm guidelines. More details should be provided to inform trail planners and to hold management agencies accountable.

Pictures above show trail alignment features used on the Hardy Road mountain bike trail network in the Wilmington Wild Forest area. Note that work is done on both sides of the trail and is typical of the alteration of mountain bike trails that is often necessary. The Guidance "Trail Alignment" section does not contain adequate guidelines and direction for trail planners and the public.

Tree Cutting

Tree cutting is a major issue both for the types and numbers of trees to be removed for trail building and for the branch trimming associated with mountain bike trails. In general, mountain bike trails are best suited for mature forests dominated by large trees and closed canopies where large portions of the understory are open and trails can be effectively routed.

State agencies are guided by rules in DEC policy LF-91-2, but it's important to note that this policy never was subject to public hearings, an environmental impact assessment, and DEC has stated on the record that there is no scientific basis for this policy.

Pictures above show different issues with tree management. Top left shows a trail from the Flume Trail network in the Wilmington Wild Forest where "trail creep" has left a tree in the middle of an ever widening trail. The other three pictures are from the Hardy Road trails. Top right shows the stump of a cut tree. Bottom left shows mature tree with lower branches trimmed. Bottom right shows stump of a questionable trailside tree that was cut down. Tree cutting is a major issue in Forest Preserve management.

Grading

This section should state that all construction and maintenance work is to be undertaken with hand tools.

Cross Drainage/Parallel Drainage

The Guidance directs planners to utilize different kinds drainage systems: “Grade reversals, broad based dips, and earthen berm water bars are preferable to log and rock water bars.” In general, it seems that this is effective direction.

These pictures above show old style log and rock drainage structures built on The Flume mountain bike trail network in the Wilmington Wild Forest area.

Rock Removal

The Guidance states that rocks will be used for a variety of purposes on mountain bike trails after they are removed from the trail surface area. The Guidance states "Stones used to narrow and define the tread will be set in a naturally random manner not compromising safe use of the trail."

Picture above shows a wall of rocks placed along the trailside of mountain bike trails in the Wilmington Wild Forest. These rocks were used to narrow the trail, perhaps, or were pulled from the trail surface. The use of these rocks would not appear to conform to the Guidance directive quoted above.

Side Slope Management

Nothing changes a trail system more than alterations that add man-made geometric forms to a wild forest area. This changes the wild forest setting and the wild forest character. Bench cuts, along with "insloped corners," are the most prevalent design techniques that cause dramatic changes to an area. A review of the mountain bike trails systems in the Wilmington Wild Forest Area at The Flume and at Hardy Road finds that bench cuts and insloped corners are widely used and dramatically change the wild forest character and forest aesthetic of the area. The Guidance language in both of these sections places no limits or boundaries on how often these features are used in a respective trail system. Such limits should be provided.

Pictures above show different bench cuts ("side slope management") made in new sections of the Hardy Road mountain bike trails in the Wilmington Wild Foreast area. Bench cuts are a frequently used technique in side slope management and, arguably more than any other trail design and construction technique, alters a trail area and changes the wild forest character of the Forest Preserve.

Wetlands

The Guidance states that wetlands should avoided, which we agree with. The wetlands section should provide better guidance for how to protect wetlands when trails pass through them. What is the best method for traversing a wetland with a mountain bike trail? What materials should be used? Should the Guidance provide any direction for bog bridges? These are just a few issues that should be further developed in the Wetlands section.

Picture above shows a bog bridge built in The Flume mountain bike trails in the Wilmington Wild Forest. This is a raised bog bridge built through a wetland area that would be highly disturbed without this protection. The Guidance should provide more information about where and how these types of bridges should be used in wetlands.

Parallel Feature Trail

Parallel Feature Trails are unique to mountain bike trails. These are not used for other forms of trails on the Forest Preserve, such as foot trails, cross-country ski trails, horse trails or snowmobile trails. These are not identified in the SLMP. These are features that purely add thrills and technical challenges to mountain bike trails. The framers of the Guidance should understand that parallel trail features as used here introduces a fundamentally new concept to the Forest Preserve.

It's important to note that parallel Feature Trails are designed specifically for mountain bike trails and in no way, shape or form are used by people in some kind multiple use trail concept where these trails somehow double as horse trails, foot trails, or snowmobile trails. These features are only found, and are only useful, on mountain bike trails.

This picture shows a short "parallel feature trail" on the left side of this mountain bike trail in the Flume trail network in the Wilmington Wild Forest area.

Insloped Corners

Insloped corners are another feature particular to mountain bike trails. These are designed and constructed purely for use on mountain bike trails and are used nowhere else on the Forest Preserve. They are essential for mountain bike trail, which are based on a series of such “corners”, which are really sharp turns or even hairpin turns, and are popular with riders and frequent features in stacked loop trails networks. Insloped corners are manmade features that change the wild forest character of an area.

It’s important to note that insloped corners are designed specifically for mountain bike trails and in no way, shape or form are used by people in some kind multiple use trail concept where these trails somehow double as horse trails, foot trails, or snowmobile trails. These features are only found, and are only useful, on mountain bike trails.

This picture shows an inslope turn in the Hardy Road mountain bike trail network. These trails features are only used on mountain bike trails and not on any other kind of trail on the Forest Preserve.

Guidelines for Bike Trail Maintenance on the Forest Preserve

No comments.

Bridges Section Needed

The Guidance outlines the widths of bridges in the chart detailing the different kinds of single-track trails, but contains no section for the how and where bridges should be installed, both for stream and wetland crossings. The Guidance needs such a section because bridges used for mountain bike tails are different from many other types of bridges used on the Forest Preserve for foot trails or snowmobile trails.

Herd Trails and Off Trail Riding Should be Prohibited

The Guidance is silent on the issue of off-trail riding of mountain bikes. It should specifically state that mountain bikes should not be used anywhere on the Forest Preserve except where specifically authorized. Herd paths made by mountain biker riders, especially in downslope areas, were evident in both mountain bike trail networks in the Wilmington Wild Forest area. The Guidance should speak to management efforts to control this illegal aspect of mountain bike riding.

This picture shows a herd path or bushwhack trail used by mountain bikers to access and ride over this erratic. It is not part of a marked trail but the disturbed trail area shows regular use. The Guidance needs to emphasize off-trail mountain bike riding is not allowed.

Guidance Fails to Effectively Manage Trail Widening or "Tread Creep"

Trail widening on mountain bike trails is evident throughout the Wilmington Wild Forest mountain bike trail systems, especially on downslope stretches of trail. The Guidance speaks to "tread creep" in three places, but fails to address management actions to limit and stop tread creep from occurring. The Guidance needs to include management prescriptions to stop and prevent tread creep.

Pictures above show different scenes from the Wilmington Wild Forest area mountain bike trails of trail widening, known as "tread creep," from mountain bike use. Tread creep is an ongoing issue in these trail networks and should be addressed more thoroughly in the new mountain bike trail Guidance.

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to submit these public comments on this important matter.

Sincerely,

Peter Bauer
Executive Director