



June 27, 2018

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NYS Department of Environmental Conservation
Region 5 Warrensburg Sub Office
232 Golf Course Road
Warrensburg, NY 12885

Kathy Regan
NYS Adirondack Park Agency
PO Box 99
Ray Brook, NY 12977

RE: Public Comment on draft Vanderwhacker Mountain Wild Forest Area Unit Management Plan Amendment

Dear Rob Ripp and Kathy Regan,

The new Vanderwhacker Mountain Wild Forest Area Unit Management Plan (VMWFUMP) contains a number of proposals for new facilities on the Adirondack Forest Preserve. This UMP amendment is important plan because it not only contains a number of proposals for natural resource management in Wild Forest areas of the Forest Preserve in the central Adirondacks, but it also sets public access to Boreas Ponds, which is part of the neighboring High Peaks Wilderness Area. This is an unusual situation on the Adirondack Forest Preserve where a major part of a Wilderness area is primarily accessed through a Wild Forest Area. The two areas are side-by-side for miles.

Protect the Adirondacks has reviewed the VMWFUMP and provides comments below on its proposals, scope, and conformance with the Adirondack Park State Land Master Plan and Forest Preserve policies.

Proposed Mountainbike Trail Networks

Protect the Adirondacks has many questions about the efficacy of two proposed new specially designed mountainbike trail networks for the VMWFUMP. We are skeptical about their viability. These two systems are poorly located and do not have the important local support of successful mountainbike trail areas, such as The Flume and Hardy Road systems in the Wilmington Wild Forest area. The two proposed mountainbike trail networks in the VMWF appear

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to violate basic tenets of the new *Management Guidance: Siting, Construction and Maintenance of Singletrack Bicycle Trails on Preserve Lands in the Adirondacks Park* in several ways. The two networks do not seem to meet the criteria to establishing a new mountainbike trail network.

Two proposed mountainbike trail networks flunk Guidance criteria for siting new trails:

The new Guidance lays out a four criteria for a new stacked loop mountainbike trail system. These criteria include “local support” and “location” as two important factors:

Local Support: The devotion of a local organization, municipality, or combination that is prepared to assist with trail maintenance and construction activities. Resources required for construction and maintenance of a stacked loop trail network requires this capacity.

Location: Stacked loop trail networks are most appropriate where Forest Preserve lands abut municipal lands or publically accessible private lands, generally within two miles of hamlet boundaries or one mile from Intensive Use areas.

The two mountainbike trail systems proposed in the VMWF fail to meet the two criteria above.

No local bike trails group near new proposed trails: These two systems are the fourth and fifth mountainbike stacked looped trail networks proposed by the DEC. Two exist in the Wilmington Wild Forest area, one has been approved but not constructed in the Moose River Plains Wild Forest, and another has been proposed in the Saranac Lake Wild Forest UMP. The Wilmington trails networks have local population centers in Lake Placid and Wilmington and attracts riders who are both local and visitors to the area. There is also an active partnership with a local bike trails organization for trail maintenance. It appears that the DEC’s zeal to build new mountainbike trail networks has far outpaced local organizations and local partnerships.

A build-it-and-they-will-come mythology is not adequate natural resource planning: DEC is planning to build these new mountainbike trail systems largely on a build-it-and-they-will-come belief with no data about public demand for mountainbiking regionally across the Adirondack Park or locally in the greater North Hudson area.

New trails fail to meet Guidance emphasis to build new trails that accommodate more than one type of user: A basic tenet of the new Guidance is that planning for mountainbike trails should consider “Accommodating more than one recreational use on a trail can help accomplish resource protection goals by reducing trail development and environmental impacts.” (p 6) The two systems proposed in the VMWF appear designed exclusively for mountainbiking and will not be attractive for hiking or cross-country skiing.

The fact that planners in the VMWF failed to adhere to the Guidance reveals more about the weaknesses of the Guidance than about the draft UMP. Recreational management in the Adirondack Forest Preserve today is about building separate trail networks for a variety of outdoor recreational activities, including hiking, mountainbiking, snowmobiling, automobile travel and roadside camping, cross country skiing and powder skiing. At the same time that the DEC is building an infrastructure to facilitate separate and diverse uses, it also masks the impacts of the most controver-

sial trail network – the roadlike class II community connector trails – by calling them “multiuse” trails though few will ever use any of the class II trails for anything other than snowmobiling,

Public Parking to Access Boreas Ponds

PROTECT supports use of the Gulf Brook Road as a public motor vehicle road in a Wild Forest area on the Forest Preserve. This road will provide public access to the Boreas Ponds as well as to hiking trails that access the High Peaks Wilderness. We note that that the retention of this road was a centerpiece of the historic compromise that saw the Boreas Ponds classified as part of the High Peaks Wilderness. Though PROTECT supported this compromise as the best deal possible within the political constraints and realities of the Andrew Cuomo Administration, we note that road maintenance on the Gulf Brook Road will be extremely costly for state agencies and that this road in particular, given the grades and topography of the area, will require regular and extensive maintenance. While we support use of this road now, we question the long-term ability of the state to adequately maintain this road as a safe and operational route for the public.

Another controversial part of the new VMWFUMP is the plan for public parking on the Gulf Brook Road to access the Boreas Ponds. The state is proposing three parking areas: 1) Parking 500 feet from the Boreas Ponds for disabled individuals and the general public under a universal access program; 2) 0.8 miles from the Boreas Ponds at the 4 Corners; and, 3) 3 miles from Boreas Ponds at Fly Brook.

This small parking lot 500 feet from Boreas Ponds is proposed to hold motor vehicles for individuals who have obtained permits under the CP-3 program (Commissioner’s Policy for Motorized Access Program for Persons with Disabilities), which allows special access for individuals to use motor vehicles to access natural resource areas in the Forest Preserve, as well as all other individuals under a “universal access” permit program. This parking area should be restricted to only allow use for people with CP-3 access. While PROTECT has long been supportive of the CP-3 program, we find the use here to be troubling because the state is proposing to allow the non-disabled public also to access this parking lot near within 500 feet of Boreas Ponds. This undermines the CP-3 program. PROTECT strongly opposes any form of public parking by any means beyond CP-3 at the proposed parking area 500 feet from the Boreas Ponds.

PROTECT believes all public parking should be at a point 0.8 miles back, or further at a location east of LeBiere Flow, from the Boreas Ponds at the 4 Corners area. The general public should not be allowed any closer in a motor vehicle than 0.8 miles. PROTECT supports an additional small public parking lot proposed to be located at Fly Brook. This parking area will accommodate hikers and the paddlers. We also support a parking lot at the entrance to the Gulf Brook Road, just off the Blue Ridge Highway.

“Universal Access Violates CP-3 Policy

The Commissioner’s Policy for Motorized Access Program for Persons with Disabilities provides “motor vehicle access to certain State lands under the jurisdiction of the Department for qualified

people with disabilities.” Under this policy access with motor vehicles is provided to permit holders on roads where the general public is either prevented from using motor vehicles or where a permit holder can use a different type of motor vehicle, such as an All Terrain Vehicle (ATV), that is prohibited for general use. Under CP-3, motor vehicle use is provided so that disabled people can access natural resource areas.

What is being proposed along the Wild Forest corridor on the Boreas Road, from the 4 Corners, to an point 500 feet from the ponds, will allow the general public the same opportunity as the disabled for enhanced motor vehicle access to the Boreas Ponds. The CP-3 policy states:

It shall be the policy of the Department to provide a qualified person with a certified disability access by a suitable motor vehicle to appropriate lands under its jurisdiction.

A qualified person with a certified disability who wants to access State land by a suitable motor vehicle, **where either the desired location is closed to motor vehicles or is open to certain motor vehicles**, but not the type of motor vehicle desired to be used by that person, may do so only through the authority of a Permit. Such Permit shall provide that a specified qualified person with a certified disability is authorized to operate a suitable type of motor vehicle as designated in the permit on all roads, trails and geographical areas designated by the Department for such use and elsewhere as specifically approved, consistent with current law and rules and regulations. In the Adirondack Park and the Catskill Park, motor vehicle use is prohibited on trails and in geographical areas, and is limited to designated and specifically marked roads on lands classified as Wild Forest and Intensive Use. Motorized use is prohibited on all lands classified as Wilderness, Canoe and Primitive.

Under the DEC proposal, CP-3 permit holders and the general public with universal access permits will share a parking area 500 feet from the Boreas Ponds. By combining public use and CP-3 access, the DEC is openly violating the CP-3 policy. The APA should reject this proposal.

Carrying Capacity

The management of hiking trails in the Adirondack Forest Preserve has generally not been science-based for design, construction and maintenance. Most hiking trails are remnant 19th century trails that run straight up mountainsides or follow old logging roads. There are few modern, newly designed, and sustainably constructed hiking trails in the Adirondack Forest Preserve, such as the highly successful Moxham Mountain Trail or the rerouted new trail up Coney Mountain. DEC and APA have not made the sustainability of and the protection of natural resources within hiking trail corridors a priority in UMPs or UMP amendments.

For a number of years, the DEC has listed boilerplate language in various Unit Management Plans about its plans to implement some form of recreation ecology management program. This language called for a combination of Carrying Capacity analysis, Levels of Acceptable Change (LAC) analysis, and the Visitor Experience and Resource Protection (VERP) framework. DEC stated in these UMPs that these tools would somehow be blended together into a cohesive analytical frame-

work. Though this blended analysis was listed in various UMPS, the DEC has never organized any kind of meaningful impact and management monitoring program for the Forest Preserve, often called recreation ecology management.

The new VMWFUMP has taken a stab at a new “Wildlands Monitoring Plan” that commits the DEC to organizing and implementing a skeletal recreation ecology management program. Protect the Adirondacks congratulates the DEC on its decision to pursue a new wildland monitoring program. Unfortunately, the new “Recreational Resources and Human Uses” section in VMWFUMP is poorly written and confused, fails to provide necessary information, and fails to enumerate a schedule for development and implementation that is publicly accountable.

There are a number of weaknesses with the state’s new approach and these are listed below.

No Definition for Best Management Practices: The DEC states that “the essentials for wildland management” are “planning, education and outreach, frontcountry infrastructure, backcountry infrastructure, limits on use when all else fails and resources both personnel and funding.” The DEC state’s further it will rely on six Best Management Practices (BMPs) that include “planning; education and outreach; frontcountry infrastructure; backcountry infrastructure; limits on use; and, financial resources for both personnel and programs.” While the DEC goes to great lengths to define some things in its new wildlands monitoring program, the BMPs are not adequately defined and as such are of limited value.

Wildland Monitoring Plans Must be Public: The DEC states in its “action steps” that it plans to develop a wildlands monitoring plan and program. How will this plan be made public? In what format and under what circumstances? Will the public get to comment on it while in draft form? The VMWFUMP does not address these issues.

DEC Program Reinvents the Wheel: There are many good recreation ecology programs being used across the U.S. and a number of practitioners and academics who implement and improve these programs. PROTECT does not see the benefit of the DEC developing its own program, when others are widely available.

Selected Indicators are Vague, Highly Subjective: The “biophysical,” “social,” “aesthetic,” and “ecosystem process” indicators that were selected for the Wildland Monitoring Plan appear highly subjective. We’re skeptical about they will be used in the field.

How Will Results from Wildland Monitoring Plan be Provided to the Public? How will the public be able to see and assess the results of the Wildlands Monitoring Plan? The VMWFUMP does not address this issue.

No Link between New Monitoring Plan and Management of Recreational Use: The VMWFUMP does not provide any information about how the monitoring plans will be used to improve Forest Preserve management. What is the link between data and management policy? What will the DEC and APA do once it has completed carrying capacity analysis? We note that the 1999 High Peaks

Wilderness Area UMP had a requirement for an annual report, but these died away quickly. We have concerns about the ability of the DEC to undertake long-term and complex ecological monitoring on the Forest Preserve.

No Timetable for Phases or Action Steps: The VMWFUMP does not set any timetables for when different phases or action steps will be completed. In this way, the new protocol does not appear to comply the requirements in the SLMP for an implementation schedule.

Required Natural Resource Inventory, Assessment, Analysis Information Not Included in UMP Amendment in Violation of SLMP

The “Unit Management Plan Development” section of the SLMP requires that the DEC organize a variety of assessments, inventories and analyses of the natural resources and facilities of a unit. If this information is not prepared, then the draft UMP or UMP amendment cannot conform to the SLMP. The SLMP calls for the following information:

an inventory of the types and extent of actual and projected public use of the area;

an assessment of the impact of actual and projected public use on the resources, ecosystems and public enjoyment of the area with particular attention to portions of the area threatened by overuse; and,

an assessment of the physical, biological and social carrying capacity of the area with particular attention to portions of the area threatened by overuse in light of its resource limitations and its classification under the master plan.

Each unit management plan will also set forth a statement of the management objectives for the protection and rehabilitation of the area’s resources and ecosystems and for public use of the area consistent with its carrying capacity. (p 27)

This information is vital for natural resource protection and recreational management planning. The SLMP says “Regardless of the criteria, the main objective is to appropriately provide sustainable and desirable facilities without exceeding the carrying capacity of the land on which they are located.” PROTECT does not see how the VMWFUMP conforms with these requirements in the SLMP.

Restoration and Rehabilitation of Natural Resources

The “Unit Management Plan Development” section of the SLMP includes a requirement that UMPs include planning for the “rehabilitation of such portions of the area as may suffer from overuse or resource degradation.” PROTECT finds no such information in the VMWFUMP. The SLMP states:

Each unit management plan will also set forth a statement of the management objectives for the protection and rehabilitation of the area’s resources and ecosystems and for public use of the area consistent with its carrying capacity.

These management objectives will address, on a sitespecific basis as may be pertinent to

the area, such issues as:

actions to minimize adverse impacts on the resources of the area;

the rehabilitation of such portions of the area as may suffer from overuse or resource degradation;

the regulation or limitation of public use such that the carrying capacity of the area is not exceeded and the types of measures necessary to achieve that objective;

This assessment and planning is important given the land use history of this area of newly acquired lands and the number of leased camp locations, logging landings, roads, skid roads, forest clearcuts, forest shelterwood cuts, and other features, that will require proactive planning to ensure rehabilitation of these negatively impacted natural resources. Clearly, no such inventory has been done that identified areas of former industrial managed timberlands that require rehabilitation. PROTECT does not see how the VMWFUMP conforms with these requirements in the SLMP.

Carrying Capacity Analysis Required for Boreas Ponds

The SLMP calls for carrying capacity for water bodies in the Forest Preserve. This is something routinely ignored in conformance reviews by the APA. Here is the relevant section of the SLMP:

A fundamental determinant of land classification is the physical characteristics of the land or water which have a direct bearing upon the capacity of the land to accept human use. Soil, slope, elevation and water are the primary elements of these physical characteristics and they are found in widely varied associations. For example, the fertility, erosiveness and depth of soil, the severity of slopes, the elevational characteristics reflected in microclimates, the temperature, chemistry, volume and turnover rate of streams or lakes, all affect the carrying capacity of the land or water both from the standpoint of the construction of facilities and the amount of human use the land or water itself can absorb. (p 14-15)

The SLMP also explicit directs Forest Preserve managers not to exceed the carrying capacity of waterbodies:

the physical, biological and social carrying capacity of the lake, or a portion of the lake, or other water bodies accessible from the site will not be exceeded; (p 40)

PROTECT believes it would make more sense to complete the required carrying capacity analysis and then use this information to size the parking lot at the 4 Corners to an appropriate size. The SLMP requires that the carrying capacity of Boreas Ponds not be exceeded, yet we see no information in the VMWFUMP amendment that addresses this issue. How can the APA find that this UMP amendment conforms with the SLMP without this necessary carrying capacity analysis?

New Foot Trails

The VMWFUMP proposes a series of new foot trails. PROTECT supports all of them. We support

the hiking trails planned for Ragged Mountain, the Boreas River, Wolf Pond, and Andrew Brook.
Hudson River Put In and Take Out

The state's acquisition of new lands along the Hudson River south of the Tahawus Mine opened up a terrific new canoe route. The VMWFUMP proposes new put-in and take-out locations that will vastly improve public access. PROTECT supports the proposals for public access to the Hudson River.

No Trailless Area Designated in VMWFUMP Amendment

PROTECT notes the absence of a designated trailless area in the VMWF area. PROTECT notes that the area west of Vanderwhacker Mountain stretching to the Hudson River would be an excellent trailless area. Unfortunately, the APA and DEC have approved a second and redundant Indian Lake to Newcomb class II trail to be cut through that area. This is tragic given the beautiful stretches of forest, including old growth. This redundant trail violates the snowmobile trail "Guidance" directive not to build duplicative trails.

Community Connector Class II Snowmobile Trail Construction Violates the Adirondack Park State Land Master Plan

The SLMP defines a snowmobile trail as "a marked trail of essentially the same character as a foot trail" and mandates that it be "compatible with the wild forest character of an area." The SLMP goes on the state that a snowmobile trail "should be designed and located in a manner than will not adversely affect adjoining private landowners or the wild forest atmosphere..." There is no way that class II community connector snowmobile trails bear any rational resemblance to something having the "character of a foot trail" or is consistent with "wild forest atmosphere."

A class II community connector snowmobile trail surface is graded, leveled, and flattened by multi-ton tracked excavators. Extensive bench cuts are dug into the trail in many sections that run for a hundred yards and are 15 to 20 feet wide in many areas. Protruding rocks are removed, roots are cut back, extensive tree cutting is undertaken, often at a rate of 1,000 trees per mile. All understory vegetation is removed and oversized bridges more than 12 feet in width are built to support multi-ton groomers. Ledge rock is fractured and split apart, trail surfaces are scarred by 6-wheel ATVs that leave deep wheel ruts, crushed gravel is often used to stabilize degraded areas, and the trail is studded with stumps. Extensive areas of forest canopy are opened above the class II trail and the trail surface is dominated by extensive grassfields incongruent with the surrounding forest. Bridges are outfitted with plastic reflectors for night-time driving. Trail signs resemble road traffic signs.

A "foot trail" is where people walk single file. Foot trails are narrow and built to go over and in between roots and rocks and around trees. Foot trail surfaces are uneven and follows the terrain. Few trees are cut down for foot trails and there are scarcely any stumps of cut trees. Vegetation on the trail side encroaches, and the trail is canopy covered. Steppingstones and split logs are commonly used to pass over streams and wet areas. There are no reflectors and grass is scarce.

For all practical purposes, class II community connector trails resemble roads much more than

foot trails.

SLMP Wild Forest Basic Guideline 4 states “Public use of motor vehicles will not be encouraged and there will not be any material increase in the mileage of roads and snowmobile trails open to motorized use by the public in wild forest areas that conformed to the master plan at the time of its original adoption in 1972.” The construction class II trails across the Forest Preserve has greatly encourage motor vehicle use on the Forest Preserve. Class II trails violate the SLMP in this way.

PROTECT has identified many other areas of the SLMP that are expressly violated by the design and construction of class II community connector snowmobile trails by their construction, intended use, and by grooming with large tracked (motor vehicle) groomers. These include:

- Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states that public access accommodations should be “consistent with the wild forest character.” PROTECT does not believe that the new road-like class II trails are consistent with the wild forest character. The trails’s width, bridges, reflectors, bench cuts, ledge cuts, use of gravel and straw, extensive surface alteration, tree cutting, stumps, and removal or trees and rocks are all inconsistent with the “wild forest character” of this area.
- Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states “All conforming structures and improvements will be designed and located so as to blend with the surrounding environment and require only minimal maintenance.” PROTECT does not believe that the new road-like class II snowmobile trails meets the “minimal maintenance” test. DEC and the APA claim that the grooming of this trail network is maintenance. Class II trails cannot be used without grooming. These trails see grooming multiple times per day on weekends. How can a trail that requires grooming in order to be operable meet the “minimal maintenance” test?
- Basic Guideline 2 (Motor Vehicles, Motorized Equipment and Aircraft) states “All management and administrative actions and interior facilities in wild forest areas will be designed to emphasize the self-sufficiency of the user to assume a high degree of responsibility for environmentally sound use of such areas for his or her own health, safety and welfare.” Leaving aside concerns of snowmobile “environmentally sound use” with their mileage rates less than most SUVs, PROTECT questions the “self-sufficiency” of the users of class II snowmobile trails because the principal recreational use of snowmobiling can only be accomplished if the trail has been regularly groomed by a multi-ton tracked groomer.
- Basic Guideline 2 (Structures and Improvements 1C) states that snowmobile trails are allowed in Wild Forest areas and “their maintenance, rehabilitation and construction” is allowable by “snowmobiles on snowmobile trails.” There is a major points here where the DEC and APA brazenly violate the SLMP.

The use of a large multi-ton groomer on a class II trail changes everything. This is the key fact obfuscated by APA and DEC in the *Guidance*. The snowpack on a class II snowmobile trail is groomed by large tracked groomers, not the trail surface. Hence this is not trail

maintenance sanctioned by the SLMP. The SLMP states that the “... the use of motor vehicles, motorized equipment and aircra will be allowed [on Wild Forest] as follows...by administrative personnel where necessary to reach, maintain or construct permitted structures and improvements.” Note that the SLMP does not say “reach, maintain, **groom** or construct...” which it would have to if grooming was allowed by a motor vehicle on a designated “trail” rather than a snowmobile with drag.

Why is Community Connector Class II Snowmobile Trail Building Accelerating as Winter Weather Declines Due to Climate Change?

PROTECT questions whether the APA and DEC should be investing in an extensive new class II snowmobile trail system in light of global climate change. In the year 2018, we now live in an Adirondack Park where it’s as likely to rain in winter months as it is to snow. We live in a part of the world that receives 30 percent more rain than it did thirty years ago. Winter months show greater warming trends than summer months. The future will bring inconsistent snowmobile seasons at best, which is already borne out in the marketplace by declining snowmobile sales.

PROTECT is puzzled how the two lead agencies for environmental issues in New York State can make major policy decisions as well as major financial decisions without taking into account the effects of long-term trends of global climate change on the Adirondack Park.

PROTECT Predicts APA and DEC will Transform Snowmobile Trail Network to ATV Trail Network as Reliable Snowfall Wanes

PROTECT predicts that the APA and DEC someday will issue a new “Guidance” to convert intermittently snowless community connector class II snowmobile trails into community connector all-terrain vehicle trails. As snowmobiling wanes we have no confidence that these agencies will withstand pressure to unleash vast ATV networks across the Forest Preserve on the roadlike class II trail system. The damage from ATV trails networks to the Forest Preserve will be vast and unrelenting as we already have seen in areas such as the Shaker Mountain Wild Forest where DEC has been unable to control illegal ATV abuse. We expect to hear the same arguments, justifications, and obfuscations that the DEC and APA used to build a community connector class II snowmobile trail system being used to create a new ATV “trail” system on the Forest Preserve.

Class II Community Connector Snowmobile Trails Violate the State Constitution

Class II trails are designed and built for snowmobiles to travel 25 miles per hour or higher and are groomed with large tracked groomers. No other recreational use in the Forest Preserve requires 9-11 foot wide trails, specifically designed and constructed to allow regular grooming with large multi-ton motor vehicles and used by highspeed motor vehicles. Unlike other trails built by hand, these trails are excavated with heavy machinery, utilize extensive bench cutting, remove thousands of trees over 3 inches diameter at breast height (DBH), remove tens of thousands of trees under 3 inches DBH, remove the entire native understory, often replace the native understory with a grass mix, open the forest canopy, often fracture and chip away bedrock, utilize oversized bridges often

equipped with reflectors, and are built to handle operation of motor vehicles. No other recreational activity in the Forest Preserve, outside of Intensive Use Areas, requires such profound terrain alteration and destruction to accommodate recreational use. For all of these reasons, class II trails violate the Article XIV, the forever wild provision, of the State Constitution.

These UMP Amendments are part of the Largest Expansion of Motor Vehicle Use in the History of the Adirondack Forest Preserve

Construction of class II community connector trail requires extensive construction and terrain modifications to facilitate large bulldozer size groomers and high-speed snowmobiling. These trails require extensive use of heavy machinery to excavate, widen, grade and cut bench cuts into trails. These machines remove all understory, require extensive tree cutting of trees over 3" diameter at breast height (DBH), and require the removal of thousands of trees less than 3" DBH. These road-like "trails" require oversized bridges as well as extensive use of deep waterbars to control stormwater impacts from open roadway conditions and sharply reduced forest cover. These 9-12 foot wide trails, which are very often wider, are clearcuts that snake through the Forest Preserve for miles. PROTECT finds that these trails are the most intensive and damaging types of trails built in the Forest Preserve today.

On behalf of the Board of Directors of Protect the Adirondacks, please accept my gratitude for the opportunity to present our concerns on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Bauer,
Executive Director