



**Board of Directors**

February 22, 2023

Charles Clusen  
**Chair**

Aaron Graves  
NYS DEC - Region 5  
Potsdam Sub Office  
190 Outer Main Street, Suite 103  
Potsdam, NY 13676

James McMartin Long  
Michael Wilson  
**Vice-Chairs**

Barbara Rottier  
**Secretary**

David Quinn  
**Treasurer**

**Re: Horseshoe Lake Wild Forest, Mt. Arab Hiking Trail Work Plan**

Dear Aaron,

Nancy Bernstein  
John Caffry  
Andy Coney  
Dean Cook  
James C. Dawson  
Lorraine Duvall  
Robert Glennon  
Roger Gray  
Evelyn Greene  
Sidney Haring  
Dale Jeffers  
Mark Lawton  
John Nemjo  
Peter O'Shea  
Philip Terrie  
Chris Walsh

Protect the Adirondacks has reviewed the draft Work Plan prepared by the NYS Department of Environmental Conservation (DEC) for the proposed project on the Mt. Arab hiking trail in the Horseshoe Lake Wild Forest noticed in the February 8, 2023 Environmental Notice Bulletin. We appreciate the opportunity to review and comment on the draft Work Plan that provides details about the work that DEC proposes to perform on Forest Preserve lands in the Adirondack Park. We offer the following comments for your consideration prior to finalizing the Work Plan.

Mt. Arab Hiking Trail Re-Route on Forest Preserve

The purpose of the proposed work on the Mt. Arab Hiking Trail is to address problems of hiker safety and erosion as a result of significant public use. A 130' long section of trail will be re-routed, and a new 185' long section will be constructed to the north. We are pleased with the proposal to take proactive action to rehabilitate the old section of trail "with rocks and logs to prevent further use" by the public (Work Plan p. 1).

**Staff**

Peter Bauer  
**Executive Director**

Claudia K. Braymer, Esq.  
**Deputy Director**

Christopher Amato, Esq.  
**Conservation Director  
and Counsel**

The Work Plan indicates that there will be cutting of no more than 41 trees 1" DBH or above. The Work Plan also indicates that the proposed trail will be increased in trail tread from 18-48" in width to 30-36" in width, with proposed clearing and disturbance limits between 48-72" in width. While we recognize that DEC is currently revising its hiking trail standards, we believe that a 72" width for clearing and disturbance is excessive for a 36" width hiking trail.

**Protect the Adirondacks**

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We note that the draft Work Plan acknowledges that the Bog River Unit Management Plan did not assign this trail a specific class or any maximum dimensions. Interestingly, the draft Work Plan (p. 1) instead uses a Trail Class Matrix developed by the US Forest Service to assign this trail a classification. This is the first time that we have seen DEC officially reference a federal trail classification system rather than use DEC policy or the trail classification system that may be provided for in the unit management plan. We understand that this is a short section of trail and that DEC is attempting to make this a more sustainable trail for the heavy public use that it receives, but we are concerned that DEC is planning to build a trail that does not comply with DEC trail policy.

The draft Work Plan states that some of the trees marked for removal near the edges of disturbance may not be cut, depending upon the work that needs to take place once construction has begun. However, the number of trees to be cut would equate to about 1200 trees per mile, which is extremely high. We urge DEC staff to make every effort to route the new trail around existing trees to avoid and minimize tree cutting as much as possible. Specifically, the existing 13-14" DBH yellow birch tree that is proposed for cutting should be avoided if at all possible. In addition, the proposed tree cutting and clearing/disturbance limits should be reduced to a maximum of 48" in width to reduce the overall tree cutting and disturbance that will be permitted by the new trail construction. This maximum clearing/disturbance limit should be planned and made effective before work begins.

DEC's draft Commissioner Forest Preserve Work Plan Policy (Draft FP Work Plan Policy) that was made available to the public in the January 11, 2023 Environmental Notice Bulletin sets forth three questions that DEC must analyze when approving work plans to ensure that the work does not alter the wild forest character of the Forest Preserve. The draft Work Plan for this proposal should better reflect DEC's analysis of whether this work will be consistent with Article 14 of the Constitution. Moreover, there should be a carrying capacity analysis to ensure that the natural resources and visitors' experiences will not be adversely impacted by this proposal, and that the level of visitor use that has caused problems in the past is adequately being addressed by this Work Plan. Additionally, the contents within the sections of the draft Work Plan should be reorganized to more closely align with the format in the Draft FP Work Plan Policy. For example, the draft Work Plan section entitled "Project Description/Desired Condition(s)" should be broken into two separate sections.

Finally, the draft Work Plan states that motorized equipment will be used, including a portable generator. If other motorized equipment may be used as part of the trail construction, that equipment should also be identified in the draft Work Plan. We also note that there was a reference to bicycle use being allowed, but the Bog River Unit Management Plan does not specify that this hiking trail is suitable for bicycle use. Therefore, bicycle use is not permitted here.

On behalf of the Board of Directors of Protect the Adirondacks, please accept our gratitude for the opportunity to share our comments on this draft Work Plan.

Sincerely,

*Claudia K. Braymer*

Claudia Braymer,  
Deputy Director