



Board of Directors

April 20, 2023

Charles Clusen
Chair

Ian Dunn (r3.ump@dec.ny.gov)
NYS DEC – Region 3 Office
Division of Lands and Forests
21 South Putt Corners Road
New Paltz NY 12561

James McMartin Long
Michael Wilson
Vice-Chairs

Barbara Rottier
Secretary

Re: Sundown Wild Forest Draft UMP Amendment

David Quinn
Treasurer

Dear Ian,

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 Unit Management Plan (UMP) amendment prepared by the NYS Department of Environmental Conservation (DEC) for the Sundown Wild Forest noticed in the March 22, 2023 Environmental Notice Bulletin. We welcome the opportunity to review and comment on this draft UMP amendment. We generally do not comment on Forest Preserve issues in the Catskills, but the original proposal for the multi-use trail that was circulated in 2021 strained constitutional limits. Similarly, the permitting and public use management at the Blue Hole may serve as potential models for replication in other areas, so we also feel compelled to review them. We offer the following comments for your consideration prior to finalizing the UMP amendment.

Staff

Additionally, we note that we appreciated gaining a better understanding of the area and problems that are being experienced during the tour that was provided of the Blue Hole and nearby portions of the Peekamoose Valley Riparian Corridor as part of the recent Forest Preserve Advisory Committee meeting.

Peter Bauer
Executive Director

Peekamoose Valley Riparian Corridor

Claudia K. Braymer,
Esq.
Deputy Director

We are pleased to see the inclusion and analysis of alternative management actions in the draft UMP amendment. We support DEC's proposal to consolidate parking in the footprint of the Peekamoose Trailer Field, and to close other parking areas in the Peekamoose Valley Riparian Corridor. DEC's proposal should include revegetation plans for the areas that will be closed. We are concerned that the proposal to construct a 5-car "Restricted Access Parking Area" is too big to be accommodated in the proposed location, and that it will cause confusion and conflict with users who are on

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

the new “connector trail” on that side of County Route 42. We suggest that the “Restricted Access Parking Area” be reduced to two (2) parking spaces for people with mobility impairments.

We are also concerned that the proposed, hardened trail width of six feet for the “connector trail” is greater than necessary, and will have negative impacts on the wild character of the Forest Preserve. It is our understanding that accessible trails can be as narrow as 36 inches in width and that 60 inches wide is sufficient to allow two people using mobility devices to safely pass each other without the need for “passing spaces”.¹ Therefore, we suggest that the trail width be reduced to three feet in width with intermittent passing spaces, or no more than five feet in width, in order to lessen the adverse impacts of this new proposed trail.

Vernoy Kill Falls Region

We applaud DEC for recognizing that “the wild character of the Forest Preserve” is “one of New York most notable landmarks”. UMP amendment p. 3. We commend DEC for abandoning plans for building a wide multi-use trail of 6-8 miles through the Sundown Wild Forest. As we noted in our field review and letter to the DEC in September 2021, the potential tree cutting and terrain alteration for the proposed wide multi-use trail would have exceeded constitutional limits. Further, the trail would have been difficult to build in a sustainable way given the steep slopes that would have required significant terrain alterations. Also, the supposed connecting trails for snowmobiles are not suitable for snowmobile use. We are pleased that “DEC has concluded that constructing a trail to accommodate snowmobiling would not be appropriate” for the Long Path re-route, and for “removing snowmobiling as an allowed use on the proposed trail segment”. UMP amendment p. 3. We believe that this new narrow trail for hiking and mountainbiking, if constructed with little to no tree cutting, rock removal and terrain alteration, will be a marked improvement for the Long Trail and make a terrific new hiking trail in the Sundown Wild Forest Area and Vernoy State Forest.

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 UMP amendment. We may have additional comments as our review of this matter continues and as the Work Plans are released for public comment.

Sincerely,



Claudia Braymer,
Deputy Director

¹ See <https://www.access-board.gov/aba/guides/chapter-10-outdoor/>.