



Board of Directors

July 25, 2023

Charles Clusen
Chair

Jonathan DeSantis
NYS DEC – Region 5 Northville Sub-Office
Division of Lands and Forests
701 South Main Street
PO Box 1316
Northville NY 12134

James McMartin Long
Michael Wilson
Vice-Chairs

Barbara Rottier
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Re: Wilson Ridge Trail Bridge Project Draft Work Plan

Dear Jonathan,

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 mountain bike trail bridge projects noticed in the July 12, 2023 Environmental Notice Bulletin. We value the opportunity to review and comment on this draft Work Plan that provides details about the work proposed on Forest Preserve lands in the Moose River Plains Wild Forest. We offer the following comments for your consideration prior to finalizing the Work Plan.

Work Plan Article 14 Compliance

We appreciate that the draft Work Plan generally follows the draft Forest Preserve Work Plan template. The draft Work Plan includes a basic description of the desired conditions for the project, a description of the measures taken to avoid, mitigate and minimize impacts to natural resources, and contains the other sections that are required by the draft Forest Preserve Work Plan template.

Staff

Peter Bauer
Executive Director

Claudia K. Braymer,
Esq.
Deputy Director

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

However, this draft Work Plan does not meet the standard required by the new DEC Forest Preserve Work Plan Policy. The draft policy states “The intent of the Work Plan is to document detailed, site-specific assessments conducted by Regional Land and Facility Managers when siting a particular project to ensure that an analysis of the relevant constitutional, statutory, and regulatory factors have been considered prior to the actual construction or modification of a project previously approved in a UMP.”

Protect the Adirondacks

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The text of this Work Plan fails to contain many important findings and does not fully inform the public about the scope of this project. We note that this Work Plan does not include a section on, or discussion of, “Article 14 Compliance,” but simply provides a box in the Regulatory Clearance Checklist for “Tree Cutting,” which is but one of four critical Article 14 compliance evaluations that should occur during the development of a Forest Preserve Work Plan. There is no discussion of Article 14 compliance for maintaining the “wild state” of the Forest Preserve in this proposed state management action. Further, a proposed project must be in done accordance with the “ultimate objective of protecting the forest as wilderness.” These are important parts of the new Work Plan policy that should have been utilized here, especially because the proposed bridge projects “are both located within a wild forest corridor surrounded by designated wilderness areas”.

Additionally, the DEC Forest Preserve Work Plan Policy template for Work Plans, found in Attachment 1 of the Work Plan Policy, requires approvals from the Regional Program Manager, Regional Supervisor of Natural Resources, Regional Director, and Division Director. These signoffs are missing from the draft Work Plan.

Description of Desired Conditions

This Work Plan encompasses the proposal to facilitate stream crossings at two locations along the Wilson Ridge Trail, which is a trail designated for mountain bike use in the Moose River Plains Wild Forest Unit Management Plan (MRP WF UMP). The proposed bridges with ramps would be 47 feet long (to cross Silver Run) and 52 feet long (to cross Little Moose Lake Outlet) with widths of 6+ feet for both bridges. We believe that these proposed bridges are too large and should be significantly reduced in size and character.

The Description of Desired Conditions in the Work Plan fails to reflect the goal of the MRP WF UMP (pp. 148-149) to develop the corridor into a single-track route for experienced mountain bike riders. According to the MRP WF UMP (p. 72), a single-track trail should be a maximum of four feet, with a trail tread less than 18 inches wide. Moreover, the APA-DEC Management Guidance for Siting, Construction and Maintenance of Singletrack Bicycle Trails on Forest Preserve Lands in the Adirondack Park (p. 19) recommends that bridges be “24” or **narrower**”, and it states that bridges should be “rustic in character, and minimally intrusive on the surrounding landscape”, and should “minimize extensive ramp construction”.

Here, the widths for the proposed bridges exceed the recommended width by four feet or more. The lengths and design of the bridges and ramps are far more in size and scope than are needed for this location that is surrounded by wilderness. Accordingly, the proposed bridges are out of character with the surrounding wild forest and do not protect the forest as wilderness. The “sleeker profile bridge” mentioned in the alternative section should be selected for the proposal.

Alternatives Section

The “Analysis of Project Location and Design Alternatives” section is weak and does not provide a thorough discussion of viable alternatives that would be both “sleeker” in profile and high enough above the water. The draft Work Plan policy received many comments pushing for

more expansive alternative action considerations. This section should be bolstered to provide a better understanding of possible alternatives. For instance, a much, much narrower and shorter bridge such as the one shown below could be constructed over the Silver Run, which according to the photograph in the Work Plan has a very low flow of water.



Caption: Photograph by Phil Brown, Adirondack Explorer

Moreover, the Little Moose Lake Outlet site is located in a remote section of a long ride where a narrower bridge could accommodate experienced riders engaging in this “demanding 28-mile ride” (Mountain Bike Trails Concept Plan for Moose River Plains Wild Forest, December 2013). A “sleeker” alternative, such as the one shown below, that allows a crossing without removal of the beaver dam is feasible and must be examined by DEC.



Caption: Photograph by Peter Bauer, Protect the Adirondacks

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,

A handwritten signature in black ink that reads "Claudia K. Braymer". The signature is written in a cursive, flowing style.

Claudia Braymer,
Deputy Director