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#### **Via Email**

August 19, 2025

Pine Roehrs  
Senior Natural Resource Planner  
NYS Department of Environmental Conservation  
Region 3  
21 South Putt Corners Road  
New Paltz, NY 12561

#### **RE: Comments on Draft Formerly Trailless Catskill Peaks Visitor Use Management Plan**

Dear Ms. Roehrs:

Protect the Adirondacks (PROTECT) appreciates the opportunity to submit these comments on the draft Visitor Use Management Plan (VUMP) for formerly trailless peaks in the Catskill Park prepared by the Department of Environmental Conservation (DEC).

While PROTECT typically does not submit comments on proposed DEC actions concerning the Catskill Forest Preserve, the issues addressed in the VUMP—particularly those related to visitor overuse, degradation of high-elevation habitat, forest fragmentation, and the associated impacts on montane bird species and recreational user experience—are highly relevant to similar challenges facing the Adirondack Forest Preserve. Given these parallels, PROTECT believes it is important to provide feedback to DEC on these critical issues in the context of the draft VUMP.

#### **General Comments**

PROTECT commends the DEC for applying the Visitor Use Management (VUM) framework to address the ecological and recreational challenges posed by the increasing number of informal herd paths on previously trailless peaks in the Catskills.

We particularly applaud DEC's use of data from platforms such as Strava and AllTrails—verified through on-the-ground fieldwork by DEC staff—to map

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informal trail networks. This data-driven approach is instrumental in identifying and analyzing the forest fragmentation caused by these unplanned paths.

We also commend DEC for its collaborative work with key partners, including the New York Natural Heritage Program, Vermont Center for Ecostudies, SUNY New Paltz, and the Carey Institute for Ecosystem Studies. These partnerships have resulted in important research and assessments, especially regarding the impacts on montane bird species and the broader Catskill High Peaks Bird Conservation Area.

Additionally, DEC's trail condition class assessments provide valuable insights into the environmental effects of informal trails and help guide appropriate management responses. PROTECT supports the agency's thoughtful and science-based approach to this increasingly pressing issue.

### **Specific Comments**

Article 14: We commend DEC for including Article 14 of the New York State Constitution—the “Forever Wild” clause—in the section addressing applicable laws, regulations, and guidance. VUMP at 13. We also appreciate the reference to the Catskill Park State Land Master Plan (CPSLMP) and the accurate inclusion of definitions for “Wilderness” and “Wild Forest.” *Id.* at 14-16. We note, however, that VUMP incorrectly states that the unifying theme of the CPSLMP is “striking a balance between resource protection and recreational use of the Catskill Forest Preserve.” *Id.* at 2. Rather, the unifying theme of the CPSLMP is that “the protection and preservation of the natural resources of the Catskill Forest Preserve will be *paramount*.” CPSLMP at 11 (emphasis added). We suggest that DEC revise the draft VUMP to correctly reflect the statement in the CPSLMP.

Visitor Experience Surveys: We strongly support DEC's use of visitor experience surveys to better understand public perceptions, user expectations, and overall recreational experiences (VUMP at 18–19). While such surveys should not dictate management decisions, they do offer valuable insights, particularly regarding user demographics and the desire for solitude, wildlife viewing, and low-impact recreation. The survey's finding that 88% of respondents were white suggests a need for DEC to broaden its outreach and engagement efforts to attract more diverse populations to the Forest Preserve. *Id.* at 19 (noting that “the overwhelming majority” of participants in the survey (88%) were white).

Physical Resource Findings: PROTECT appreciates DEC's field work documenting soil and vegetation impacts on the informal trails and on the summits of the formerly trailless peaks in order to better understand the nature and extent of those impacts. VUMP at 30.

Biological Resource Findings: We strongly support DEC's biological inventory of the study area's lands and summits and the documentation of recreational user impacts on those ecological resources. VUMP at 36-50. We urge DEC to use the same approach when undertaking the management actions described in Section III (Management Strategies and Actions). VUMP at 37.

Indian Nations: PROTECT supports DEC's acknowledgment of the historical and ongoing relationship of Indigenous Nations with the Catskill region. VUMP at 21-23. We particularly appreciate the recognition of Traditional Ecological Knowledge (TEK) and encourage continued consultation and collaboration with Native communities in the development of management proposals.

Educational Messaging: PROTECT supports the VUMP's recognition of the importance of educating the public about sensitive ecosystems in the formerly trailless peaks, the adverse impacts of overuse and dispersed informal trail networks, and responsible recreational behavior to protect natural resources and ensure safety. VUMP at 24. However, we strongly oppose reliance on signage at the trailhead and other Forest Preserve locations (e.g., trail intersections) as the primary means of public messaging. The proliferation of trailhead signage detracts from the wild forest character of the Forest Preserve and is a visual blight on the landscape. In addition, the multitude of signs—some of which include several paragraphs of small type—make it likely that hikers will simply disregard them rather than delay the start of their hike to assimilate all the information provided. We recommend providing information online for use in hikers' planning of trips and simply posting QR codes that link to detailed online resources, including social media posts, videos, and interactive maps, which would be more effective and less intrusive.

Ecological Zones: PROTECT supports the VUMP's establishment of two zones for describing and achieving desired conditions: a Sensitive Resource Zone (above 3500') and an Environmental Protection Zone (below 3500' within 500 meters of existing informal trail networks). VUMP at 43-56. These zones are grounded in sound ecological science and ensure that conservation priorities are met while affording appropriate recreational access. We also support the articulated desired conditions for each zone, which reflect a commitment to both resource protection and user experience.

Indicator Thresholds: PROTECT supports the use of forest fragmentation as a natural resource indicator. VUMP at 56-57. We agree with the goal of no more than three forest patches in Zone 1 areas. However, we believe the proposed threshold of six patches in Zone 2 areas is too high. Instead, this threshold should be adjusted in proportion to the number of acres within each Zone 2 area. As illustrated in the VUMP, several peaks with relatively small acreages (e.g., Bearpen, Vly, Eagle, and Southwest Hunter) have less than six patches, suggesting that lower thresholds are achievable. A sliding scale based on acreage would ensure that forest fragmentation is effectively minimized while accounting for differences in Zone 2 acreage.

Hiking Club Challenges: We strongly support DEC's identification of hiking club "challenges" as a significant factor contributing to the proliferation of informal trail networks and recreational overuse that is adversely impacting the Forest Preserve. VUMP at 66-72. While some hiking club challenges are responsible and sustainable, others promote excessive, repeated summit hikes over short timeframes, encouraging behavior inconsistent with DEC's stewardship mission. We agree with the VUMP's characterization of such activities as being "at odds with DEC's statutory obligation or sustainable natural resource management." *Id.* at 72.

Management Strategies and Actions: PROTECT urges DEC to use the management strategies and actions described in Section III to ensure protection of the Forest Preserve's ecological resources.

*Id.* at 37. PROTECT strongly supports DEC's proposed visitor containment strategy of designating formal trails, which will reduce forest fragmentation by concentrating foot traffic into a single corridor. VUMP at 77-78. We urge DEC to not limit trail sustainability assessments to only those instances deemed "necessary and appropriate," but rather to conduct assessments consistently for all proposed formal trails. *Id.* at 77. Additionally, we support efforts to rehabilitate or relocate unsustainable trail segments and to permanently close undesirable or duplicative informal trails through brushing and natural material barriers. A long-term, sustained commitment to the monitoring, maintenance of formal trails, and the closure of informal trails, will be key to the success of this strategy.

### **Conclusion**

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our comments on the draft VUMP.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Amato", with a stylized flourish at the end.

Christopher Amato  
Conservation Director and Counsel