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## Working for Wilderness

RE: Management Guidance for Single Track Bike Trails.

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The Adirondack Mountain Club (ADK) appreciates the opportunity to comment on the proposed management guidance for the siting, construction and maintenance of single track bike trails on Adirondack Park Forest Preserve lands.

We respectfully request that you consider the following commendation and comments outlined below.

ADK supports the proposed guidance. The guidance addresses the main factors that should be considered using best practices and acceptable methods for trail building and maintenance. Since much of the guidance has been adopted from the International Mountain Bicycling Association (IMBA), the principles outlined have been in practice for at least ten years and are proven.

Currently, mountain bike specific trails have been constructed on Department of Environmental Conservation (DEC) Wild Forest lands following all of the principles contained in the draft management guidance, specifically, trails in the Wilmington Wild Forest at Flume and Hardy Road, and in the Elm Ridge Wild Forest. These trail networks, which follow the proposed guidance, are a showcase of proper trail development for mountain biking and for other uses such as hiking.

Please consider the following suggested revisions to the proposed guidance:

Under IV. Guidelines for Bike Trail Design and Construction on the Forest Preserve, include a sentence that discusses how bike trails should be constructed. "Hand built" is mentioned only once under I.6. We think it should be made clear that bike trails should be hand built without the use of motorized equipment such as mini-excavators or other earth moving machines and this rule should apply to all the guidelines (A-F) outlined.

In V. Guidelines for Bike Trail Maintenance on the Forest Preserve, "Annual work plans may include an annual clearing of loose organic (leaves) from the

tread surface.” should have more clarification of the tools allowed and more importantly, indicate tread width clearing standards. A simple lawn rake is the most common tool used, but leaf blowers are also used quite often and there is a lot of debate amongst DEC personnel about using them. The debate primarily stems from the fact that trails are often cleared wider than the actual tread width, sometimes up to five to six feet, when a leaf blower is used. Clearing standards need to be established, especially when a leaf blower is used. Referencing the Singletrack Trail Rating System and Characteristics table on pg. 7 under III.A.1, it should be stated that loose organic debris will be cleared to a maximum of a 36 inch tread width. Having a tread clearing standard for trail maintainers (staff and volunteers) to follow is an imperative and will help DEC planners in developing work plans along with monitoring trail maintenance that is completed.

Thank you for your consideration of these comments.

Sincerely,

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