



January 21, 2016

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Conservation

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Education

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Recreation

Since 1922

RE: Draft Unit Management Plan Amendments to The Wilmington Wild Forest
2005 Unit Management Plan.

Mr. Steven Guglielmi,

Thank you for giving the Adirondack Mountain Club (ADK) the opportunity to comment on the Draft Unit Management Plan for The Wilmington Wild Forest 2005 Unit Management Plan.

The Adirondack Mountain Club (ADK) is dedicated to the conservation, preservation, and responsible recreational use of the New York State Forest Preserve and other parks, wild lands, and waters vital to our members and chapters. ADK represents over 28,000 members who enjoy hiking, canoeing, kayaking, cross-country skiing, camping, backpacking, biking, mountaineering, snowshoeing, and other "muscle-powered" outdoor activities in New York. We sponsor programs that range from teaching people to hike and paddle safely to repairing our state's peerless hiking trail network. We are advocates for responsible recreation and protection of the Forest Preserve, state parks and other wild lands.

ADK applauds the DEC for being proactive in the improvement of mountain biking and skiing opportunities in the Wilmington Wild Forest Unit. The ADK supports the use of mountain bikes and skiing on the forest preserve in areas where such use is deemed appropriate.

ADK would like to call attention to the user conflict that will occur in the Flume Trail network with the proposed trails. In the proposed trail relocations, there will be a small segment (approximately .25 miles) of foot trail that will overlap with the Wilmington Snowmobile Trail just south east of the SUNY Atmospheric Science

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Research Center. As this snowmobile trail has significant use as a downhill mountain bike trail, it would be in the public's interest to relocate the hiking trail so that it does not share the snowmobile trail.

ADK is concerned about the Cooper Kill Trail preferred alternative 3C¹. The alternative mentions in the first line "*This alternative would not be in strict compliance with the snowmobile guidance due to the separation distance from the closest motorized travel corridor*". If an alternative plan goes against the snowmobile guidance document and yet is still the preferred alternative, what is the point of having a guidance document? ADK is skeptical that such a trail would truly reduce the impact on the forest preserve, as more forest will be cut away to provide for the trail. Furthermore, this plan maximizes the impact area of the trail by creating multiple loops. The impact zone of trails extends from their edges into the surrounding forest preserve² (especially with motorized uses such as snowmobiling whose impact can exceed 1000ft)³ and loop trails maximize that "edge effect". As the Snowmobile use of the Cooper Kill Pond is light⁴ it would make sense for the DEC to manage the trail for more popular uses such as mountain biking and skiing. ADK urges the DEC to find a non-loop alternative for access to the Cooper Kill Pond or remove snowmobiling as a use for the trail and manage it for non-motorized use.

ADK suggests the DEC consider an alternative similar to 3B that instead closes only the section of original snowmobile trail east of the proposed reroute. This would alleviate the wetland/swamp issues related to this section of trail, maintain a loop system for non-motorized use, and still provide motorized access to Cooper Kill Pond. Please reference the edited DEC map attached to this document for a visual representation of ADKs proposition.

While rerouting the entire eastern half of the Cooper Kill Pond trail would not be legal or appropriate, short sections of this trail require remediation. ADK suggests implementing short trail reroutes around steep and eroded trail sections along with water bars. These improvements will make this approach to Cooper Kill Pond a more desirable and enjoyable route for hiking, skiing, and mountain biking.

Thank you for your time and consideration of our comments.

Sincerely,



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¹ Department of Environmental Conservation Wilmington Wild Forest Draft Unit Management Plan Amendment to the 2005

Wilmington Wild Forest Unit Management Plan. http://www.dec.ny.gov/docs/lands_forests_pdf/wwfdrftamend.pdf.

² Winter Wildlands Alliance. (2014). *Environmental Impacts from Snowmobile Use*. Retrieved from:

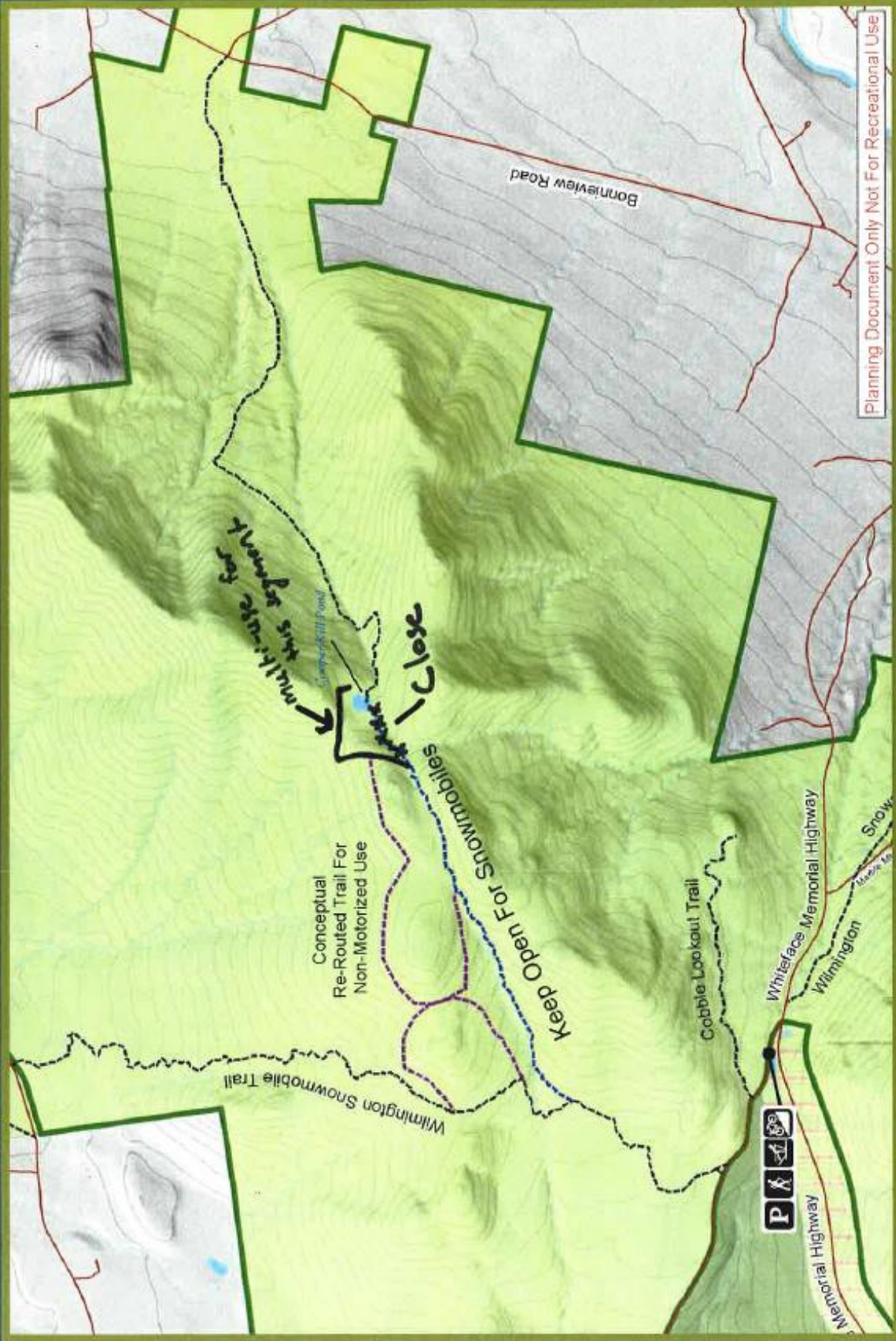
<http://winterwildlands.org/wp-content/uploads/2014/05/Environmental-Impacts-from-Snowmobile-Use.pdf>.

³ Baker, Elizabeth. (2005). *Snowmobiling in the Adirondack Park: Environmental and Social Impacts*. Retrieved from:

http://it.stlawu.edu/~bart/Barthelmess/CB2005_final_papers/pdfs/snowmobiles.pdf.

⁴ Department of Environmental Conservation Wilmington Wild Forest Draft Unit Management Plan Amendment to the 2005

Wilmington Wild Forest Unit Management Plan. http://www.dec.ny.gov/docs/lands_forests_pdf/wwfdrftamend.pdf. PG: 7,12



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