

28 January 2019

Kevin Prickett
NYS Adirondack Park Agency
P.O. Box 99
Ray Brook, NY 12977
SLMP_Comments@apa.ny.gov

RE: Management Guidance for Cross Country Ski Trail Design, Construction and Maintenance on Forest Preserve Lands in the Adirondack Park

Dear Kevin,
Thank you for giving the Adirondack Mountain Club (ADK) the opportunity to comment on the proposed guidance concerning ski trail development in the Forest Preserve.

Adirondack Mountain Club (ADK)

ADK is dedicated to protecting and advocating for New York State's wild lands and waters while also teaching people how to enjoy natural places responsibly. Since 1922, the organization has offered people opportunities to stay and play in as well as protect, discover, and explore the outdoors. Today, ADK has 30,000 members in 27 chapters statewide and is served by a professional, year-round staff. The organization is recognized as a vital voice in the commitment to environmental stewardship and ethical outdoor recreation in New York State. ADK members hike, camp, snowshoe, cross-country ski, paddle, and cycle the lands and waters of the Adirondack Park and other state lands. Our members are also monitors and maintainers of trails and recreation infrastructure as well as watchdogs of public lands and watersheds to monitor for invasive species or irresponsible and destructive motorized trespass.

We would like to acknowledge the agency for taking steps towards making trails in the Forest Preserve more skier-friendly, and ADK generally supports the outline and content of the proposed guidelines. However, we are concerned that the proposed guidelines do not conform to the Adirondack State Master Plan (APSLMP). The APSLMP must be amended before the proposed guidelines are implemented.

We are unable to endorse these guidelines unless there is a change in the Definitions section of the Adirondack Park State Land Master Plan (APSLMP) guidelines so that these proposed guidelines do not impact Foot Trails. Given that these guidelines apply to the definition of a

Cross Country Ski Trail (CCST) as now defined in the APSLMP, which states that a CCST has the dimension and character of a Foot Trail, ADK does not want these new proposed guideline dimensions to be considered equivalent to the character and dimension of a Foot Trail. The definition of a CCST should be tied to the proposed guidelines, but not tied to the definition of a Foot Trail. This could be accomplished by removing the word “dimensions,” through an amendment to the APSLMP, from the current definition of a CCST.

Further, we are concerned with several issues in the guidelines, and feel that the APA and the DEC must provide further explanation. Notably, the provisions for clearing width, height and the construction of skintracks need further review.

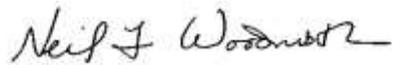
Without endorsing the proposed guidelines at this time, ADK generally supports the outline and content of the proposed guidelines and the changes in relation to the current NYS Department of Environmental Conservation (DEC) manual. The current dimensions for Nordic Skiing in the DEC manual are defined as 4ft in Wilderness and 8ft in Wild Forest. As such, the current dimensions do not accommodate backcountry skiing. Under the proposed guidelines, width and height of a trail may be cleared up to a maximum of 12ft in certain instances. The proposed guidelines allow clearing up to 12ft for width when the slope grade exceeds 10%, and up to 12 ft for height to allow for snowpack build up.

The specific construction of uphill skintracks concerns us. In the offseason hikers may be tempted to use these skintracks as an alternative “express trail” to ascend peaks. Hikers could cause damage to the skintrack resulting in erosion. ADK strongly encourages APA to outline how the agency plans to monitor the skintracks for inappropriate use and to educate hikers about avoiding these cleared pathways. Monitoring and education will be essential in order for the skintracks to remain useable by skiers. Summer use by hikers would cause serious erosion since the skintracks will not be designed or built for hiking or use without snow cover.

We generally support the outline and content of the proposed guidelines, but ADK does not endorse these guidelines at this time, unless and until there is a change in the Definitions section of the Adirondack Park State Land Master Plan (APSLMP) guidelines so that these proposed guidelines do not impact the definition of Foot Trails. ADK does support the intent of the efforts of the APA and DEC in their work to help make backcountry and Nordic skiing more accessible. However, implementing the proposed guidelines would require an amendment to

the APSLMP. We must also ensure that skiing and the use of ski trails have the smallest environmental impact possible so that future generations may also enjoy these recreational resources and activities.

Sincerely,

A handwritten signature in black ink that reads "Neil F. Woodworth". The signature is written in a cursive style with a prominent "N" and "W".

Neil F. Woodworth
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