

**From:** Bert Yost <bertyost@frontiernet.net>  
**Sent:** Monday, September 25, 2017 2:36 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Mountain biking guidelines

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

To whom it may concern,

As a small business owner in Wilmington and an avid mountain biker, my wife and I strongly support the APA/DEC draft of the proposed guidelines for mountain biking trail development. Having been involved in the Flume and Hardy Rd Trail systems for almost 20 years, we are very excited about the guidelines and the proposed new trails for the Saranac Lake Wild Forest. Mountain biking has been growing on a yearly basis in our area. Our local B&B has definitely benefited from the development of trails in the Wilmington Wild Forest. Our guests have commented on how great the trails are in our area. New trail development will just help to increase tourism in the North Country. Our thanks to everyone involved.

Regards,  
Heike & Bert Yost  
Owners, Willkommen Hof B&B

**From:** Bill Fibiger <bill@fibiger.org>  
**Sent:** Wednesday, September 27, 2017 4:21 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Biking on public lands in Adirondacks

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

I am a 71 year old homeowner in the Town of Newcomb. Bike riding on the Essex Chain logging roads provides a wonderful opportunity to visit parts of the publicly owned lands that would otherwise be unavailable to me. There are hundreds of miles of hiking trails near me, but I am not as nimble and don't have the stamina I had 20 years ago. Biking is also a way for the Town of Newcomb, and the surrounding towns, to become economically healthy. Biking opportunities will encourage visitors to spend time here. Biking should also be allowed on the many logging roads of The Boreas Tract. A bike certainly does not endanger roads that recently supported fully loaded logging trucks and skidders.

William W. Fibiger  
PO Box 71  
Newcomb, NY 12852

Phone: 518.378.2753

Sent from my Underwood typewriter.

**From:** Bob Doherty <doherty4troy@gmail.com>  
**Sent:** Monday, August 21, 2017 9:06 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Adirondack Bike path favorable comment

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

I am a soon to be 73 year old Troy resident- 1585 Tibbits Avenue, Troy, NY 12180 cell phone 518-368-7092. I have enjoyed biking, increasing my frequency and miles consistantly since turning 50. Two years ago, I completed the Buffalo to Albany Erie Canal Tour. I use the local bike baths Corning, Mohawk trail to Schnectady and the new Slingerlands trail out of Alabny for enjoyment and pleasure. Expanding bike paths encourage safe recreation and enjoyment to all. Please continue all efforts to rpovide safe venues for recreational bikes for our health and community building. Thanks Robert Doherty

**From:** Bradley Howe <bradley.howe@rozeboombrokerage.com>  
**Sent:** Monday, September 25, 2017 4:25 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** State Guidance for Mountain Bike Trails

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Good Afternoon,

I'd like to express my support for the proposed Bicycle Trail Guidance for the Adirondack Park. Mountain biking can be a beneficial and sustainable activity with positive economic impact for the region if trails are built appropriately. Thank you for addressing the issue.

Regards,

Bradley Howe

**ROZEBOOM BROKERAGE, INC.**

120 West Avenue

Suite 210

Saratoga Springs, NY 12866

P: 518.450.7712

C: 518.225.2980

ICE ID: bhowe

Skype: bradbikes

Trillian: brad.rbinc

**From:** brian@whiterestaurants.com  
**Sent:** Monday, September 25, 2017 4:02 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** ADK Mt Bike trails

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hello,

I am writing to voice my support for developing sustainable mt bike and multi-use trails throughout Adirondack Park.

We are a family of avid mt bikers - Wife races, I race, my 4.5 year old did her first race this year, and my son will be out there when he can. We travel to ride as a family and individually, and we spend money while doing so. We spend on food, bike stuff, beer, kids' stuff. If the riding is good enough, we'll stay overnight.

For us, Mt biking is the summer version of skiing - great family activity outside with an aerobic component.

Thanks

Brian White

**From:** Cathy Pedler <cathypedler.adk@gmail.com>  
**Sent:** Friday, September 29, 2017 9:10 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Cc:** Neilwoody@gmail.com; Wes Lampman  
**Subject:** ADK Comments on Management Guidance for Single Track Bike Trails  
**Attachments:** ADK Comments on Management Guidance for Single Track Bike Trails 9-28-2017.pdf

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Please find attached Comments by the Adirondack Mountain Club on the Management Guidance for Single Track Bike Trails on the Adirondack Forest Preserve.

Thank you,

Cathy

Cathy Pedler  
Government Relations and Conservation  
Adirondack Mountain Club  
301 Hamilton Street  
Albany, NY 12210

[518-449-3870 x10](tel:518-449-3870)

[cathy@adk.org](mailto:cathy@adk.org)

[cathypedler.adk@gmail.com](mailto:cathypedler.adk@gmail.com)

Working for Wilderness, [adk.org](http://adk.org)



## Working for Wilderness

### Member Services

814 Goggins Rd.  
Lake George, NY  
12845-4117  
Phone: (518) 668-4447  
Fax: [adkinfo@adk.org](mailto:adkinfo@adk.org)  
Website: [www.adk.org](http://www.adk.org)

### North Country Operations

PO Box 867  
Lake Placid, NY  
12946-0867  
Reservations: (518) 523-3441  
Office: (518) 523-3480  
Fax: (518) 523-3518

### Albany Office

301 Hamilton Street  
Albany, NY  
12210-1738  
Phone: (518) 449-3870  
Fax: (518) 449-3875

28 September 2017

Kathy Regan  
NYS Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 12997  
Email: [SLMP\\_Comments@apa.ny.gov](mailto:SLMP_Comments@apa.ny.gov)

RE: Management Guidance for Single Track Bike Trails.

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,

Wes Lampman  
Chief Operating Officer  
Adirondack Mountain Club  
wes@adk.org  
518-668-4447 Lake George  
518-523-3480 Adirondack Loj



Neil F. Woodworth  
Executive Director and Counsel  
Adirondack Mountain Club  
neilwoody@gmail.com  
518-449-3870 Albany office  
518-669-0128 Cell  
518-668-4447 x-13 or 25 Lake Georg



**From:** Christopher Morris <cmorrisphoto@gmail.com>  
**Sent:** Friday, September 29, 2017 3:58 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Cc:** Saratoga Mtb  
**Subject:** Comments on Proposed Singletrack Trails in Adirondack Preserve  
**Attachments:** SMBA Comments on Management Guidance for Single-Track Bike Trails .pdf

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Ms. Regan,

Saratoga Mountain Bike Association is pleased to be able to submit the attached letter of comment on the proposed Guidance Document for Singletrack Mountain Bike Trails in The Adirondack Park Forest Preserve Lands. We appreciate the Adirondack Park Agency's willingness to address this topic and found the guidance document to be very well thought out.

Sincerely,

Christopher Morris  
President, Saratoga Mountain Bike Association

sent from my phone



September 25, 2017

Kathy Regan  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

Ms. Regan,

Saratoga Mountain Bike Association (SMBA) wishes to voice its strong support for the proposed Management Guidance for the Siting, Construction and Maintenance of Single-Track Bike Trails on Forest Preserve Lands in the Adirondack Park.

SMBA is a 501c3 not for profit organization made up of dedicated outdoor enthusiasts working to create riding opportunities, providing and preserving trail access and promoting mountain biking in New York's Capital Region and beyond.

Mountain Biking is an exciting outdoor activity that continues to grow in popularity both across the county and in New York State. SMBA feels that the draft Management Guidance document is an excellent collection of mountain bike specific definitions, best practices, and trail design considerations that accurately and thoughtfully speak to the desired experiences of off-road riders, from novice to experienced. SMBA especially appreciates the inclusion and explanation of the trail components identified as a "Parallel Feature Trail". Identifying trail design components such as this helps to communicate and support the unique type of riding experience that today's mountain bikers often look for in trail destinations.

Thank you for the opportunity to submit these comments on the draft Management Guidance document and for your continued consideration and inclusion of mountain biking in the Adirondack Park.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Morris", is written over a light blue horizontal line.

Chris Morris  
President, Saratoga Mountain Bike Association

**From:** Eric Smallman <Esmalls@nycap.rr.com>  
**Sent:** Thursday, August 24, 2017 9:03 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Singletrack Bike Trails on the Adirondack Forest Preserve

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Attn Kathy Regan, APA, and DEC:

With regards to the public comments on the proposed plan for singletrack mountain bike trails in the Adirondack preserve, I would like to offer the following.

Many locations throughout the northeast, and across the entire United States have embraced the sport of mountain biking as an ecologically friendly way to get people outside, exercising, and in touch with beautiful natural locations such as the Adirondacks.

One such network here in the Northeast is the Kingdom Trails network in East Burke VT. This is a perfect example of how a trail system can be planned, and implemented. It has also proven to be an enormous tourism attraction for an otherwise quiet rural area.

Other such networks are Pine hill park in Rutland VT, and the Gurney lane trails in Queensbury, NY. While these 2 examples are smaller in nature than the Kingdom Network, they can provide good examples of how the natural terrain can be utilized in an ecologically friendly way.

Mountain bike trails are typically very narrow and have a low impact on the natural terrain.

In closing, I'd like to remind you that Tourism also means increased revenue in and around the surrounding areas.

I hope you will consider my comments in consideration of this plan.

Regards,  
Eric Smallman

**From:** ExecutiveDirector@protectadks.org  
**Sent:** Friday, September 29, 2017 2:40 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Mountain Bike Guidance Comments from Protect the Adirondacks  
**Attachments:** 170929-PROTECT Comments on APA Mountain Bike Guidance.pdf

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Kathy Regan,

Please find attached, public comments from Protect the Adirondacks on the APA's draft guidance for single track mountain bike trails.

Cheers,

Peter Bauer  
Executive Director  
**Protect the Adirondacks**  
PO Box 769  
1851 State Route 9  
Lake George, NY 12845  
Office 518.685.3088  
Cell 518.796.0112  
[executivedirector@protectadks.org](mailto:executivedirector@protectadks.org)  
[www.protectadks.org](http://www.protectadks.org)



## Board of Directors

Charles Clusen  
**Chair**

Marilyn DuBois  
Sidney Harring  
Michael Wilson  
**Vice-Chairs**

James McMartin Long  
**Secretary**

David Quinn  
**Treasurer**

Nancy Bernstein  
John Caffry  
Andy Coney  
Dean Cook  
Lorraine Duvall  
Robert Glennon  
Roger Gray  
Evelyn Greene  
Peter Hornbeck  
Dale Jeffers  
Mark Lawton  
Peter O'Shea  
Barbara Rottier  
Philip Terrie

Peter Bauer  
**Executive Director**

September 29, 2017

Kathy Regan  
NYS Adirondack Park Agency  
PO Box 99  
Ray Brook, NY 12977

### **RE: Public comments on draft APA-DEC "Management Guidance: Siting, Construction and Maintenance of Singletrack Bike Trails on the Forest Preserve in the Adirondack Park"**

Dear Kathy,

These comments are submitted as part of the public comment period for the new draft "Management Guidance: Siting, Construction and Maintenance of Single-track Bike Trails on the Forest Preserve in the Adirondack Park" (Guidance) promulgated by the Adirondack Park Agency (APA). This document seeks to create a uniform management process for locating, building and maintaining networks of mountain bike trails in the Adirondack Forest Preserve. Though mountain bikes have been used in the Forest Preserve since the 1980s, the major policy direction provided by the APA has been the prohibition of their use in Wilderness areas. Since then, mountain bike advocates have prevailed in their advocacy for the designation and construction of more separate and specially designed mountain bike trail systems. The first was in the Wilmington Wild Forest area and recent Unit Management Plans and amendments have seen new systems proposed or approved in the Moose River Plains and Saranac Lake Wild Forest areas. Mountain bike use is increasing in popularity and now the state is wisely undertaking a proactive management approach to facilitate the growing interest by the public in this recreational activity.

While the mountain bike trails in the Wilmington Wild Forest have seen high numbers of users, both in the older "Flume" trail network and the newer "Hardy Road" trail network, the challenge for state planners will come from new efforts to build mountain bike trail networks in areas of the Adirondack Park that are both less populated and less visited. For instance, the state is taking a build-it-and-they-will-come approach with the recent new mountain bike trail networks approved in the Moose River Plains Wild Forest area outside of the Eighth Lake Campground.

#### **Protect the Adirondacks**

PO Box 769, Lake George, NY 12845 518.685.3088

[www.protectadks.org](http://www.protectadks.org) [info@protectadks.org](mailto:info@protectadks.org)

Like Us on Facebook Follow us on Twitter @ProtectAdkPark

Overall, the mountain biking Guidance is an effort to provide public and accountable direction to state planners for expanding and maintaining a mountain bike trail system on the Forest Preserve. This follows a guidance document prepared for snowmobile trails and nascent efforts for guidance documents on cross-country ski trails and open tree (powder? backcountry?) ski trails. Though “Guidance” documents are approved as official policy of state agencies, they are not law, and as we have seen with the snowmobile trail guidance, they are easily subverted and ignored when deemed necessary or convenient for state agencies to do so. The core provisions in the snowmobile trail guidance against building trails through interior areas of the Forest Preserve, building redundant trails, and minimizing negative impacts such as extensive trail grading and bench cutting with heavy machinery, to name a few things, are all provisions that have all been openly ignored by the APA Board and staff. We certainly hope that the APA Board, as it takes up this new mountain bike trail Guidance, will redouble its commitment to live within the boundary lines of the new public policy that it creates.

## General Comments

The Adirondack Forest Preserve is now fully in the throes of a new era where it is being managed primarily for recreational use, not for natural resource protection. A major part of the heightened focus on recreational use is the development of abundant and separate trail systems for various recreational uses: hiking trails (foot trails), snowmobile trails, horse trails, mountain biking, and roads being the dominant trail systems/networks. There is also an active clamor for a new recognized and formally managed “open tree skiing” trail network, which presumably will see its own guidance document some day. Each of these recreational pursuits has distinct trail systems with different designs, construction techniques, and maintenance issues. In many ways, what we’re seeing today is a major experiment in outdoor recreational management with the results far from known.

The Guidance devotes a great deal of energy and thought to something it calls the “multiple (shared) use” trail that it defines as “A trail that permits more than one type of use.” No such thing as a “multiple use trail” or “shared trail” is defined in the Adirondack Park State Land Master Plan. The Guidance would be improved by making reference only to the types of trails that are defined and approved in the SLMP.

The concept of the multiple use trail is central to the Guidance. A multi-use trail as used by the Guidance is a trail that is designed to facilitate a series of different recreational uses. Hence, a snowmobile trail is also a hiking trail, a bike trail, a horse trail, etc., or vice versa. While the APA and Department of Environmental Conservation (DEC) have embraced multiple use trails as a core concept, and approved them in recent UMPs, they’re a myth in both reality and practice.

Multiple use trails are a myth because such trails are actually designed for one specific activity, which fundamentally undermines the trail’s attractiveness or functionality for other activities. For instance, a multiple use mountain bike trail is designed with banked turns, narrow trail tread, narrow foot bridges without railings, and in compact trail networks where bikers ride in meandering loops, rather than on a trail leading to a single destination. While these trails may be useful for nearby residents as places to walk their dogs, in practice they fail as hiking trails because they

lead nowhere, fail as horse trails because they are too narrow, fail as snowmobile trails due to their basic designs, and fail as cross-country ski trails because only experts can negotiate the series of hairpin turns popular on mountain bike trails.

Another example of failed multiple use trail planning is found with “class II community connector snowmobile trails,” which are regularly billed as multiple use trails. Class II trails are designed to widths of 12 feet, with all trees, both big and small, and all understory vegetation removed. Stumps are cut to ground level and all rocks, downed and decaying trees, and hummocks that protrude more than three inches are flattened. All natural pits are filled in and the trail corridor is universally flattened. Grading with heavy machinery is undertaken over long stretches and extensive bench cuts that reshape the upslope, trail tread, and downslope with manmade forms of combined widths of 15-20 feet are common. These trails often have open canopies for long stretches. At the end, oftentimes, the highly disturbed trail corridor is planted with a grass seed mix. The result is something much different than a hiking trail or a mountain bike trail. The result is a highly altered, disturbed and wide corridor through the Forest Preserve that is designed and constructed for snowmobile use, yet state agencies claim it’s a multiple use trail though by its very nature and design resoundingly fails to possess any of the attributes or features desired by the hiking or mountain biking communities. As such, class II trails are stark failures in practice as multiple use trails.

It’s also important to know that basic critiques about the viability of class II community connector snowmobile trails/multiple use trails are not seriously answered by state agencies. To wit, during the approval of the new class II community connector snowmobile trail from Newcomb to Minerva, we raised issues about the limited snowfall in the greater Minerva area. That part of the Adirondacks receives far less snowfall than Lake Placid and less than half of the average snowfall seen in the Old Forge area. Despite the fact that snow is a necessary ingredient for a successful class II snowmobile trail, state agencies refused to look at snowfall in official “Response” documents under the State Environmental Quality Review Act (SEQR) by stating the Newcomb to Minerva class II community connector trail was a multiple use trail and not solely a snowmobile trails. In this matter state agencies were just playing games.

The new mountain bike trail Guidance blithely continues to claim that multiple use trails are used by people for different recreational purposes. In fact, the only multiple use trails that work are designated roads on the Forest Preserve, such as the Cedar River to Limekiln Lake Road, which is used by motor vehicles for three seasons and snowmobiles in the winter. Other than this road, and other roads used the same way, there is no multiple use trail that is actually used by large numbers of people for different recreational uses in the Adirondack Forest Preserve.

The Guidance would be on more stable footing if it dispensed with the fiction of the multiple use trail. State planners should take the position that the Forest Preserve is big enough to provide different recreational infrastructures for different recreational activities, as long as they comply with Article IX, Section 1 of the NYS Constitution.

### **Guidance Does Not Align with the State Land Master Plan**

The Guidance seeks to set formal and long-term policy for building new mountain biking trail

170929-PROTECT Comments on APA Mountain Bike Guidance.pdf

networks in the Forest Preserve. In many ways the Guidance, and state agencies, are undertaking activities that are explicitly directed by the State Land Master Plan.

If there is a unifying theme to the master plan, it is that the protection and preservation of the natural resources of the state lands within the Park must be paramount. Human use and enjoyment of those lands should be permitted and encouraged, so long as the resources in their physical and biological context as well as their social or psychological aspects are not degraded. This theme is drawn not only from the Adirondack Park Agency Act ... and its legislative history, but also from a century of the public's demonstrated attitude toward the forest preserve and the Adirondack Park.... (p 1)

The enormous tracts of Forest Preserve provide a public resource for recreation in a wild setting that is unique in the eastern half of the United States and complements the more developed facilities of the excellent state park system in the rest of the state. (p 5)

These two sections show that the essentially wild Forest Preserve is the place that is supposed to complement more developed outdoor recreational facilities. Hence, the Forest Preserve was not envisioned to be used as the source and location for "more developed facilities." Such facilities, like Gore and Whiteface Mountain Ski Areas, have been developed through amendments to the Article 14 of the NYS Constitution. There is certainly an open question about whether "stacked loop" and highly concentrated mountain bike trail networks qualify as "more developed facilities."

Later, the SLMP states in the Wild Forest section: "Save for [certain notable exceptions...] the state should rely on private enterprise to develop intensive recreational facilities on private lands within the Park." (p 7) Again, there's an open question about whether these intensive recreational facilities, such as The Flume and Hardy Road mountain bike trail networks, as well as those planned for the Saranac Lake Wild Forest and Moose River Plains Wild Forest, should be directed to private land and not the Forest Preserve. There's certainly an argument that the SLMP is directing such facilities to private land, rather than the Forest Preserve.

### **Statement of Purpose and History of Bike Trails on the Forest Preserve**

The opening paragraph in this section makes important statements:

New York's Forest Preserve is a destination for various road and trail based cycling opportunities. This document provides guidelines solely for the management of Department of Environmental Conservation (DEC or Department) singletrack bicycle trails ("bike trails") on land classified as Wild Forest in the Adirondack Forest Preserve. It is intended to help land managers consistently design, construct and maintain bike trails and bike trail networks that protect natural resources and wild forest character while also providing a valuable recreational opportunity.

We applaud the emphasis on protecting natural resources and the wild forest character of Wild Forest areas. The sole focus of the new mountain bike trail Guidance should be to direct state planners on how locate, design, construct and maintain singletrack mountain bike trail networks



in Wild Forest areas. The sections in this Guidance on “doubletrack” trails and trails on “former woods roads” are a distraction and unnecessary.

The statement above is followed by another paragraph:

Mountain biking opportunities on lands classified as Wild Forest, Primitive and Canoe have historically been offered on former woods roads and existing trails designed for other modes of travel. The Master Plan dictates where cycling is a conforming use on Forest Preserve lands. Mountain bikers generally prefer riding on singletrack track trails designed specifically for mountain biking. Former woods roads and multiple use trails will continue to be an important part of the Forest Preserve trail network open to bikes. However, single-track trails designed and built for mountain biking on lands classified as Wild Forest is the focus of this guidance.

This paragraph is not accurate. It uses the phrase “former woods roads.” There is no definition in the SLMP for a “former woods road.” The SLMP has definitions for “administrative roads,” “bicycle trail,” “cross country ski trail,” “foot trail,” “horse trail,” “improved cross country ski trail,” “road,” and “snowmobile trail,” but contains no definition for a “former woods road” or any kind of woods road. Nor does the Guidance define a “former woods road.” The Guidance should be consistent with the SLMP. The Guidance should not invent new terms to allow uses or activities that are not expressly authorized in the SLMP. As such, the paragraph above must be rewritten.

The Guidance states that mountain bike trails have been routed on “former woods roads” on Forest Preserve lands classified as Wild Forest, Primitive and Canoe. We note that any classified Forest Preserve lands should have a Unit Management Plan that designates various trail or road types that comply with the SLMP. The Guidance states that “former woods roads” will continue to be an important part of the Forest Preserve trail network, but in reality they will only be so if they are designated as some form of official “trail” or “road” through the UMP process, unless the Guidance is somehow stating that off trail bushwhacking with bikes is allowable in Wild Forest areas, which does not appear to be the case.

The focus on “former woods roads” makes the Guidance incoherent. The only places where mountain bikes are allowed on the Forest Preserve is on designated roads trails.

We agree that the sole focus of this Guidance should be on specially designed singletrack mountain bike trails and suggest the following changes to the second paragraph in the Statement of Purpose to read:

Mountain biking opportunities on lands classified as Wild Forest, Primitive and Canoe **are provided on designated roads, foot trails, snowmobile trails, and on approved administrative roads.** The Master Plan dictates where cycling is a conforming use on Forest Preserve lands. Mountain bikers generally prefer riding on singletrack track trails designed specifically for mountain biking. **Bicycle riding on designated roads, foot trails, snowmobile trails, and on approved administrative roads** will continue to be a part of the Forest Preserve trail network open to bikes. However, singletrack trails designed and built

for mountain biking on lands classified as Wild Forest is the focus of this guidance.

Further, calling dirt roads “doubletrack” trails is not accurate and is pure policy artifice. The loose stones, sand, and rough surface of most Forest Preserve roads make doubletrack riding impossible. Mountain bike riding on dirt roads in the Forest Preserve is not popular. For example, the roads opened for mountain bike riding in the Essex Chain Lakes area are hardly used. Only a handful of people who signed the register at the Essex Chain Lakes area June - August 2017 wrote they did so for mountain biking. These roads are sandy and have lots of loose stone that are neither enjoyable nor suitable for mountain bike riding. To call designated “roads” on the Forest Preserve double-track trails is disingenuous.

The Guidance makes one important acknowledgement on page 8: “using former woods roads as doubletrack bike trails requires careful evaluation of the existing conditions before opening the trail to bike use.” This statement would be much more useful to state agencies and the public if it provided some criteria for undertaking the “careful consideration” and described the “existing conditions.” Such an analysis was not done when the state chose to open roads for mountain biking in the Essex Chain Lakes Primitive area. Mountain bike use has been marginal in that area and as a recreational management program it has been a failure. This Guidance would be on stronger footing by focusing exclusively on the mountain bike trail networks that the public craves – singletrack trail networks – and dispense with planning for mountain bike riding on snowmobile trails and roads in Wild Forest Areas, and where allowable under a UMP on administrative roads, because this use is incidental. The sections on “doubletrack” trails should be deleted.



*Picture on left above of section of Hardy Road mountain bike trail. It's very narrow with a compacted surface. On right is a dirt road in the Essex Chain Lakes area, which is characterized by a sandy surface with lots of loose stone. Mountain bike riders strongly prefer single track trails whereas the roads on the Forest Preserve are not heavily used for mountain biking. It's important to note how different the singletrack mountain bike trail on the left is from the dirt road on the right. These types of trails provide very different experiences for riders. Overwhelmingly, mountain bike riders seek riding opportunities on specially designed singletrack trails and not on old dirt roads.*

## Definitions

The guidance refers to “multiple use trails.” There is no such thing defined in the SLMP. The Guidance would be improved by making reference only to the types of trails that are defined and approved in the SLMP.

Delete references to “doubletrack trails.” It’s a fiction. It’s policy artifice. It makes no sense. It distracts from the focus on singletrack trails.

## Planning the Trail Network

The “Planning the Trail Network” section states an objective of providing specialized trails for mountain bikes primarily in Wild Forest areas of the Forest Preserve. The Guidance states:

The “trail styles” and “riding opportunities” described in this section reflect the interests of mountain bikers and how they can be accommodated in a way that upholds the fundamental values of the Forest Preserve. High quality mountain biking experiences are created through the development of riding opportunities that incorporate trail styles appealing [sp] to mountain bikers.

The Guidance is clear here that its primary purpose is to establish a management system that provides appealing mountain bike riding experiences. This section lists questions it believes should be asked, and presumably answered, when plotting a new mountain bike trail network:

Consider the following questions when evaluating a single trail or a network of trails for shared use suitability:

**Who** is the trail designed for and who will be sharing it? E.g., cyclists, hikers, trail runners, equestrians, snowmobiles or skiers.

**What** is the character of the trail? I.e. Are soils on the trail particularly sensitive? How are the sight lines? How fast will users typically be travelling along the trail? Are trail users all travelling in the same direction? How rough is the tread surface? Is it especially difficult for trail users to pass each other due to the terrain?

**When** will the users be on the trail? E.g., at the same time, during different seasons.

**Where** is the trail located? E.g., frontcountry, backcountry, Wild Forest, Intensive Use, etc.

**How** often will encounters between different trail users occur, and are these encounters likely to have a negative impact on the experience that trail users expect to have?

In the “Who” questions section, the Guidance asks about shared use of the trail. This section talks about shared use between mountain bikes and equestrian uses, among other uses. It does not seem viable that horses are compatible with narrow trails with smooth surfaces, banked turns and narrow bridges. A horse using the new Hardy Road mountain bike trail network would do a



*Picture above shows a specially built banked turn, known as an inslope corner, on a section of the Hardy Road mountain bike trail network in the Wilmington Wild Forest. It's hard to imagine a scenario where this trail is appropriate for shared "equestrian" uses (horse riding) and would not be damaged. This is also a feature not used on a foot trail.*

lot of damage. The concept of a shared use or multiple use trail system, as written about above, is a flawed construct used by state planners.

The "What" section asks some important questions that the Guidance does not answer or provide direction to trail planners. For instance, the question "Are soils on the trail particularly sensitive?" is asked, yet the Guidance provides no information on the soils most conducive to supporting mountain bike riding. The question "How are the sight lines?" is asked, yet the Guidance provides no instruction on what constitutes good sight lines? The question "How fast will users typically be travelling along the trail?" is asked, yet the Guidance says nothing about speeds of mountain bikers. The question "Are trail users all travelling in the same direction?" is asked, yet the Guidance provides no direction that trail systems should be designed for 1-way traffic for mountain bikers. The question "Is it especially difficult for trail users to pass each other due to the terrain?" is asked, yet the Guidance provides no information on how riders on mountain bike trail networks pass one another on narrow trails. Is the slower rider expected to pull off the trail? Is the slower rider expected to stop and step aside? Is the faster rider expected to pass the slower rider by going off trail? Do the different mountain bike trail categories described in the "Trail Styles" section contemplate riders passing each other in different ways? What are the different underlying topography or geological conditions that make for suitable mountain bike trail networks?

The "What" section needs to be improved by asking some other questions. Among these: What are the effects on wildlife? What are the effects on forest regeneration? What are the special habitats in the area? What erosion control features are required? What is the plan for bridges in the area? What wetlands are in the area?



The “When” section questions appear incomplete. Is this section asking “When will different recreational activities be undertaken on this trail? When are user conflicts likely to occur? How will these conflicts be resolved?”

The “Where” section uses terms “frontcountry” and “backcountry.” If such terms are going to be used, they should be defined. The other question that should be asked in this section is: “Does the location comply with the Guidance location requirements for proximity to Hamlet areas and Intensive Use areas?”

The “How” section only asks about potential user conflicts. While this is an important question other questions should also be asked. How will erosion be controlled? How many bridges will be needed? How many raised bog bridges are needed? How will wetlands be impacted? How will special habits be protected?

## **Trail Style**

This section provides direction for “singletrack” and “doubletrack” trails. We reiterate our comment above the focus on singletrack trails.

## **Singletrack Trails**

The set widths for different singletrack trails are important to chart, but we note that many mountain bike trails experience trail creep where riding widens trails.

## **Doubletrack Trails**

This section should be deleted. This is a Guidance about singletrack trails.

## **Riding Opportunities**

This section should be revised to state the sole focus is on singletrack mountain bike trail networks,

## **Stacked Loop Network**

The Guidance envisions compact mountain bike trail networks that are designed in what is called a “stacked loop network.” In these networks many miles of trails are designed in a relatively small area. In addition to the requirement for a compact network of trails, the Guidance envisions that each network will provide trails of different levels of difficulty, from easy to expert, from corresponding changes from wider trails to narrower trails.

The “Environmental Conditions” section needs work as rather than “commonly occurring habitats” for a criteria for siting mountain bike trail networks, wouldn’t it make more sense to identify the specific forest habitat types and soil types that are most conducive to providing high quality mountain bike trail networks?

170929-PROTECT Comments on APA Mountain Bike Guidance.pdf

The stacked loop trail networks described in the Guidance are similar to those already approved in the recent amendment to the Moose River Plains Wild Forest area and that is pending in the Saranac Lake Wild Forest Area UMP.

### **Long Distance Tour**

To date the only successful mountain bike trails are the networks of “stacked loops” built in the Wilmington Wild Forest Area. While there is a long distance mountain bike race, the Black Fly Challenge, through the Moose River Plains, that area sees little mountain bike use outside of the race weekend and the week before. No specially built mountain bike trails have been constructed for long distance touring. Given that mountain bike use is prohibited in Wilderness areas, and must absolutely remain prohibited in Wilderness areas, the opportunities for long distance tour trails for hamlet to hamlet biking is limited without riding for long stretches on paved roads.

Given the patchwork quilt design of the Adirondack Forest Preserve, with many Wilderness and Wild Forest areas intermingled, long distance tours will likely require a change to the SLMP. Currently, the SLMP states:

#### **Boundary structures and improvements and boundary marking**

1. Where a wilderness boundary abuts a public highway, the Department of Environmental Conservation will be permitted, in conformity with a duly adopted unit management plan, to locate within 500 feet from a public highway right-of-way, on a site-specific basis, trail-heads, parking areas, fishing and waterway access sites, picnic areas, ranger stations or other facilities for peripheral control of public use, and, in limited instances, snowmobile trails. (p 27)

The argument could certainly be made for allowing mountain bike trails in Wilderness areas within 500 feet of a public right-of-way, the same that exists, though is seldom used, for snowmobile use. The Guidance should acknowledge the practical reality of needing to revise the SLMP to achieve long distance touring for mountain biking.

### **Winter Cycling**

Do trails where winter cycling is envisioned need to be groomed? We have seen the “fat bikes” that the Guidance speaks about for winter use ridden to Camp Santanoni using the tracks of the cross-country skiers or the snowmobile tracks from the caretakers at Camp Santanoni. The Guidance makes no statement about grooming snow on mountain bike trails, so we take it that this is not allowed. If fat bikes need a groomed trail then the only option for winter riding is on a groomed snowmobile trail.

### **Downhill or Free Ride Trails**

These are proposed for Intensive Use areas, such as Whiteface Mountain or Gore Mountain Ski Areas. Because they are in Intensive Use and utilizing downhill ski trails we have no comments.

## Guidelines for Bike Trail Design and Construction on the Forest Preserve

There are many elements to mountain bike trails that are not found in other trail systems. There are also many similarities. It's important for the Guidance to detail the areas of trail design that are unique to mountain bike trails and mountain bike trail networks.

The Guidance appears to be silent on the types of tools and machinery that is allowable to be used to build and maintain mountain bike trails. We urge that the Guidance states clearly that all work must be done with hand tools and that no heavy machinery or so-called "low impact landscaping equipment," which in reality are multi-ton excavators/bulldozers, are allowed.



*Picture above shows a 10,000 pound "mini-excavator" used by the DEC. The APA Snowmobile Trail Guidance classifies this machine as "low impact landscaping equipment." The impacts from wide use of this machine, and others like it, profoundly altered class II community connector snowmobile trail corridors. The mountain bike Guidance is silent on the equipment that can be used to construct and maintain these trails. The Guidance should state clearly that all work done on mountain bike trails should be done with hand tools.*



## Trail Alignment

Trail alignment is an important part of mountain bike trail design and construction. The Guidance speaks in generalities with out any firm guidelines. More details should be provided to inform trail planners and to hold management agencies accountable.



*Pictures above show trail alignment features used on the Hardy Road mountain bike trail network in the Wilmington Wild Forest area. Note that work is done on both sides of the trail and is typical of the alteration of mountain bike trails that is often necessary. The Guidance "Trail Alignment" section does not contain adequate guidelines and direction for trail planners and the public.*



## Tree Cutting

Tree cutting is a major issue both for the types and numbers of trees to be removed for trail building and for the branch trimming associated with mountain bike trails. In general, mountain bike trails are best suited for mature forests dominated by large trees and closed canopies where large portions of the understory are open and trails can be effectively routed.

State agencies are guided by rules in DEC policy LF-91-2, but it's important to note that this policy never was subject to public hearings, an environmental impact assessment, and DEC has stated on the record that there is no scientific basis for this policy.



*Pictures above show different issues with tree management. Top left shows a trail from the Flume Trail network in the Wilmington Wild Forest where “trail creep” has left a tree in the middle of an ever widening trail. The other three pictures are from the Hardy Road trails. Top right shows the stump of a cut tree. Bottom left shows mature tree with lower branches trimmed. Bottom right shows stump of a questionable trailside tree that was cut down. Tree cutting is a major issue in Forest Preserve management.*



## Grading

This section should state that all construction and maintenance work is to be undertaken with hand tools.

## Cross Drainage/Parallel Drainage

The Guidance directs planners to utilize different kinds drainage systems: “Grade reversals, broad based dips, and earthen berm water bars are preferable to log and rock water bars.” In general, it seems that this is effective direction.



*These pictures above show old style log and rock drainage structures built on The Flume mountain bike trail network in the Wilmington Wild Forest area.*

## Rock Removal

The Guidance states that rocks will be used for a variety of purposes on mountain bike trails after they are removed from the trail surface area. The Guidance states “Stones used to narrow and define the tread will be set in a naturally random manner not compromising safe use of the trail.”



*Picture above shows a wall of rocks placed along the trailside of mountain bike trails in the Wilmington Wild Forest. These rocks were used to narrow the trail, perhaps, or were pulled from the trail surface. The use of these rocks would not appear to conform to the Guidance directive quoted above.*



## Side Slope Management

Nothing changes a trail system more than alterations that add man-made geometric forms to a wild forest area. This changes the wild forest setting and the wild forest character. Bench cuts, along with “insloped corners,” are the most prevalent design techniques that cause dramatic changes to an area. A review of the mountain bike trails systems in the Wilmington Wild Forest Area at The Flume and at Hardy Road finds that bench cuts and insloped corners are widely used and dramatically change the wild forest character and forest aesthetic of the area. The Guidance language in both of these sections places no limits or boundaries on how often these features are used in a respective trail system. Such limits should be provided.



*Pictures above show different bench cuts (“side slope management”) made in new sections of the Hardy Road mountain bike trails in the Wilmington Wild Forest area. Bench cuts are a frequently used technique in side slope management and, arguably more than any other trail design and construction technique, alters a trail area and changes the wild forest character of the Forest Preserve.*



## Wetlands

The Guidance states that wetlands should avoided, which we agree with. The wetlands section should provide better guidance for how to protect wetlands when trails pass through them. What is the best method for traversing a wetland with a mountain bike trail? What materials should be used? Should the Guidance provide any direction for bog bridges? These are just a few issues that should be further developed in the Wetlands section.



*Picture above shows a bog bridge built in The Flume mountain bike trails in the Wilmington Wild Forest. This is a raised bog bridge built through a wetland area that would be highly disturbed without this protection. The Guidance should provide more information about where and how these types of bridges should be used in wetlands.*



## Parallel Feature Trail

Parallel Feature Trails are unique to mountain bike trails. These are not used for other forms of trails on the Forest Preserve, such as foot trails, cross-country ski trails, horse trails or snowmobile trails. These are not identified in the SLMP. These are features that purely add thrills and technical challenges to mountain bike trails. The framers of the Guidance should understand that parallel trail features as used here introduces a fundamentally new concept to the Forest Preserve.

It's important to note that parallel Feature Trails are designed specifically for mountain bike trails and in no way, shape or form are used by people in some kind multiple use trail concept where these trails somehow double as horse trails, foot trails, or snowmobile trails. These features are only found, and are only useful, on mountain bike trails.



*This picture shows a short “parallel feature trail” on the left side of this mountain bike trail in the Flume trail network in the Wilmington Wild Forest area.*



## Insloped Corners

Insloped corners are another feature particular to mountain bike trails. These are designed and constructed purely for use on mountain bike trails and are used nowhere else on the Forest Preserve. They are essential for mountain bike trail, which are based on a series of such “corners”, which are really sharp turns or even hairpin turns, and are popular with riders and frequent features in stacked loop trails networks. Insloped corners are manmade features that change the wild forest character of an area.

It’s important to note that insloped corners are designed specifically for mountain bike trails and in no way, shape or form are used by people in some kind multiple use trail concept where these trails somehow double as horse trails, foot trails, or snowmobile trails. These features are only found, and are only useful, on mountain bike trails.



*This picture shows an inslope turn in the Hardy Road mountain bike trail network. These trails features are only used on mountain bike trails and not on any other kind of trail on the Forest Preserve.*

## Guidelines for Bike Trail Maintenance on the Forest Preserve

No comments.

### Bridges Section Needed

The Guidance outlines the widths of bridges in the chart detailing the different kinds of single-track trails, but contains no section for the how and where bridges should be installed, both for stream and wetland crossings. The Guidance needs such a section because bridges used for mountain bike trails are different from many other types of bridges used on the Forest Preserve for foot trails or snowmobile trails.

### Herd Trails and Off Trail Riding Should be Prohibited

The Guidance is silent on the issue of off-trail riding of mountain bikes. It should specifically state that mountain bikes should not be used anywhere on the Forest Preserve except where specifically authorized. Herd paths made by mountain biker riders, especially in downslope areas, were evident in both mountain bike trail networks in the Wilmington Wild Forest area. The Guidance should speak to management efforts to control this illegal aspect of mountain bike riding.



*This picture shows a herd path or bushwhack trail used by mountain bikers to access and ride over this erratic. It is not part of a marked trail but the disturbed trail area shows regular use. The Guidance needs to emphasize off-trail mountain bike riding is not allowed.*



## Guidance Fails to Effectively Manage Trail Widening or “Tread Creep”

Trail widening on mountain bike trails is evident throughout the Wilmington Wild Forest mountain bike trail systems, especially on downslope stretches of trail. The Guidance speaks to “tread creep” in three places, but fails to address management actions to limit and stop tread creep from occurring. The Guidance needs to include management prescriptions to stop and prevent tread creep.



*Pictures above show different scenes from the Wilmington Wild Forest area mountain bike trails of trail widening, known as “tread creep,” from mountain bike use. Tread creep is an ongoing issue in these trail networks and should be addressed more thoroughly in the new mountain bike trail Guidance.*

On behalf of the Board of Directors of Protect the Adirondacks, please let me express our gratitude for the opportunity to submit these public comments on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Bauer". The signature is fluid and cursive, with a large initial "P" and a long, sweeping underline.

Peter Bauer  
Executive Director

**From:** Hal Feinstein <hal.feinstein2@gmail.com>  
**Sent:** Monday, September 25, 2017 5:23 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Single track bike trail development

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

To whom it may concern.

The Adirondacks are stunningly beautiful. Development of mountain bike trail systems throughout the park would draw in mountain bike enthusiasts from around the country if done properly. This will stimulate economic growth in communities around these trail systems. I grew up in Gloversville which is at the base of the Adirondacks. Development of Single track in the southern tip of the park could be a godsend to Gloversville and its surrounding communities.

Thank you.

Hal Feinstein

**From:** Jackie Bowen <jbowen@adirondackcouncil.org>  
**Sent:** Thursday, September 28, 2017 2:30 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Cc:** Regan, Kathleen D (APA); Frank, Peter J (DEC); Rocci Aguirre  
**Subject:** Bicycle Trail Guidance comment letter  
**Attachments:** APA.DEC\_Bicycle Trail Guidance\_Final.pdf

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Kathy and Peter,

Attached are the Adirondack Council's comments for the proposed Bicycle Trail Guidance. Please let me know if there are any issues opening the document.

Respectfully,

Jackie

--

Jackie Bowen  
Grant Conservation Associate  
Adirondack Council  
518.873.2240 x 111  
[www.AdirondackCouncil.org](http://www.AdirondackCouncil.org)





*The mission of the ADIRONDACK COUNCIL is to ensure the ecological integrity and wild character of the ADIRONDACK PARK for current and future generations.*

#### BOARD OF DIRECTORS

September 28, 2017

ROBERT J. KAFIN  
Chair

MICHAEL A. BETTMANN, M.D.  
Vice-Chair

SARAH C. HATFIELD  
Vice-Chair

DANIEL J. RYTERBAND  
Treasurer

CHARLES D. CANHAM, Ph.D.  
Secretary

EMILY M. BATESON  
JILL CHOATE BEIER  
DAVID E. BRONSTON  
LIZA COWAN  
GEORGINA CULLMAN, Ph.D.  
THOMAS CURLEY  
PHILIP R. FORLENZA  
ETHAN FRIEDMAN  
CHRISTOPHER J. GORAYEB  
KEVIN MCNULTY  
SARAH J. MEYLAND, MS, JD  
SHERRY NEMMERS  
JUSTIN POTTER  
MEREDITH M. PRIME  
BRIAN RUDER  
KATE RUSSELL  
DOUGLAS SCHULTZ  
LAUREL SKARBINSKI  
DOUGLAS STEWART  
CURTIS R. WELLING  
ETHAN WINTER

EXECUTIVE DIRECTOR  
WILLIAM C. JANEWAY



Kathy Regan  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977  
*(Via electronic submission)*

Peter Frank  
Forest Preserve Bureau Chief  
NYS Dept. of Environmental Conservation  
625 Broadway, 5<sup>th</sup> Floor  
Albany, NY 12233-4254

#### **RE: Draft Management Guidance: Siting, Construction and Maintenance of Singletrack Bike Trails on Forest Preserve Lands in the Adirondack Park for Compliance with the Adirondack Park State Land Master Plan**

Ms. Regan and Mr. Frank,

On behalf of the Adirondack Council, I want to thank you for the opportunity to offer the following comments on the *Draft Management Guidance: Siting, Construction and Maintenance of Singletrack Bike Trails on Forest Preserve Lands in the Adirondack Park for Compliance with the Adirondack Park State Land Master Plan (SLMP)*. The Council applauds the Adirondack Park Agency (APA) and the Department of Environmental Conservation (DEC) for proactively addressing the development of singletrack mountain bike trails on Wild Forest Units within the Forest Preserve. If amended the Council can support this document as an important initial step in creating well-designed, ecologically sensitive, low-impact singletrack trails within Wild Forest Areas. The Council requests improvements be made to strengthen the natural resource protections within these guidelines.

The Adirondack Council appreciates APA's and DEC's inter-agency efforts to develop guidelines that support mountain biking as a growing and popular recreational activity. As the demand for mountain biking in appropriate Park areas increases, such as within the Wilmington and Moose River Plains Wild Forests and the recently proposed mountain bike trails in the Saranac Lake Wild Forest, a guidance document is both necessary and well timed.

With some improvements, the Adirondack Council believes the proposed management guidelines will: 1) Comply with the Adirondack Park State Land Master Plan by prioritizing natural resource protections; 2) ensure that consistent siting, construction and maintenance practices are implemented across the Park; 3) avoid and minimize natural resource impacts via the creation of mountain bike specific trails; 4) acknowledge mountain bike trails cater to a specific type of user and require a specific trail design; 5) highlight singletrack riding as a unique biking experience separate from other riding experiences (e.g. double track, carriage road, or long route); and 6)

DEFENDING THE EAST'S GREATEST WILDERNESS



encourage land managers to identify appropriate landscapes capable of sustaining this use while prioritizing protection of the natural resources and ecological integrity (as required by the SLMP), and preservation of the wild character of these lands (as required by the constitution, laws and the courts).

Regarding specific details on the singletrack bike trail siting, construction and maintenance guidelines, the Adirondack Council requests adoption of the following changes and consideration and response to the following comments:

1. Cite Adirondack Park State Land Master Plan (SLMP): The Purpose statement of Section I should explicitly cite the unifying theme of the SLMP to ensure the guidance document reflects the master plan's prioritization of natural resource protection on Forest Preserve lands. The consistent inclusion of this important SLMP language in other management guidelines, such as the *Standard Snowmobile Trail Bridge Design and Use of Natural Materials for Design and Construction*, *APA State Land Master Plan Interpretation and Staff Guidance* and the *Minimum Requirements Approach Guide*, indicates the importance of including it within the Mountain Bike guidelines.
2. Cite "Forever Wild" requirements of Article XIV of the State Constitution: For the guidelines to be consistent with the SLMP as required and noted above, they must also be compliant with other applicable laws and Article XIV. The courts' support of the constitution and its requirements means that the wild forest character of the Forest Preserve must be preserved or restored. Notably, in the Appellate Division decision in the "MacDonald" case (emphasis added):

*"we must conclude that the idea intended was a health resort and playground with the attributes of a wild forest park as distinguished from other parks so common to our civilization. We must preserve it in its wild nature, its trees, its rocks, its streams. It was to be a great resort for the free use of all the people, but it was made a wild resort in which nature is given free reign. Its uses for health and pleasure must not be inconsistent with its preservation as forest lands in a wild state. **It must always retain the character of a wilderness.** Hunting, fishing, tramping, mountain climbing, snowshoeing, skiing, or skating find ideal setting in nature's wilderness. It is essentially a quiet and healthful retreat from the turmoil and artificialities of a busy urban life. Breathing its pure air is invigorating to the sick. No artificial setting is required for any of these purposes. Sports which require a setting which is man-made are unmistakably inconsistent with the preservation of these forest lands in the wild and natural states in which Providence has developed them."*

3. Additional Definitions Needed: To eliminate ambiguities and to ensure the clear and consistent use of terms throughout the document, the following terms need to be formally defined within Section II (Definitions):
  - a. Backcountry
  - b. Carrying capacity
  - c. Criteria (quantifiable and non-quantifiable)

- d. Doubletrack trail: The language provided on page 8 (from “Former woods roads...” and ending with “...before opening the trail to bike use”) should be removed as the emphasis of the guidance is focused on singletrack trails. Additionally, this definition should clarify how this type of trail compares to NYSOPRHP family-oriented greenway<sup>1</sup> trails.
  - e. Downhill & Freeride
  - f. Fat bike
  - g. Frontcountry
  - h. Greenway Biking Trails (see above)
  - i. Long distance tour: A technical definition should be provided for this term. Also, the description on page 11 needs to be refined to clarify, and specifically address, where and under what conditions and settings this type of route would be considered appropriate.
4. Decision-Making Framework Needed: The Council believes this guidance document must provide a clear process that evaluates alternatives and a range of criteria to guide trail siting, difficulty and construction. The Minimum Requirements Approach Guide (MRA) outlines a thoughtful process that incorporates well defined criteria, a number based ranking system, and a narrative component that addresses a wide range of management decisions for siting and construction of bridges in Wild Forest areas and should act as a useful template for this management document.
- a. Standardization of Singletrack Trail Criteria, Rating System and Characteristics: The decision-making matrix should formally standardize the chart provided on page 7, and include a process of how the chart will be used to implement different kinds of trails. Further, it should clearly define trail characteristics and difficulty ratings.
  - b. Winter Cycling: This framework should incorporate criteria to evaluate winter cycling and the use of fat bikes (e.g. whether trails will impact or allow for other winter recreation opportunities like skiing and snowshoeing).
5. Balance of Mechanized vs. Passive Recreation: As recreational opportunities for singletrack mountain biking are expanded in appropriate Wild Forest units, additional resources need to be identified to open up new areas for non-mechanized public access. These areas should specifically offer a more meditative experience that minimizes user conflicts.
6. Nuanced Bridge Construction & Citation of Minimum Requirements Approach Guide: The document lacks guidance on the design and construction of bridges. According to Barkeater Trails Alliance and other mountain bike trail organizations, bridges for these

---

<sup>1</sup> See greenway definition listed in New York State Office of Parks, Recreation and Historic Preservation’s *Genesee Valley Greenway State Park Management Plan*, at page 11: Greenways are defined by Charles Little in *Greenways for America* as “linear open space established along a natural corridor such as a river front, stream valley, or ridge line, or overland along a railroad right of way converted to recreational use, a canal, scenic road, or other route.” (Little 1990)

APA, DEC\_Bicycle Trail Guidance\_Final.pdf

types of trails require a more nuanced design than foot bridges to allow for a seamless transition between the trail tread and bridge (see Image 1, below). Bridges made of natural materials contribute to the rider's overall experience by blending with the natural landscape. The Mountain Bike guidelines should reflect this traditionally accepted bridge design, and non-natural materials should only be used if the span and width of the bridge exceeds the standards identified within the chart on page 7 and should then follow the MRA process for bridge design and construction.

7. Professional Expertise Requirement: Section V should be revised to address the high level of relevant mountain bike trail expertise needed to site, construct and maintain trails. The Council visited the Hardy Road trails in Wilmington and it was apparent that the creation of in-sloped berms (see Images 2, below), well-drained turnpikes that require stacking stones below the soil surface to facilitate drainage (see Image 3, below), and replacing disturbed mosses once turnpike construction is complete (see Image 4, below), demand a level of constructional expertise that underscores the need for professional trail builders to be used. To plan for this situation, the guidelines should require trail building professionals be identified and consulted as an early component of the trail guidance process and that groups entering into a volunteer agreement with DEC have access to these resources. Not all local organizations or municipalities have these professional resources in-house and this would ensure that trails across the Park meet the same professional standards.
8. Paid Trail Crew: The Council is highly supportive of community partnerships but we believe a paid trail crew and dedicated state funding sources are critical to support the long-term viability of this recreational opportunity within the Park. As suggested by APA Chairman Craig, DEC should consider "a cadre of trained professionals be utilized whom deal specifically with bicycle trails in order to maintain the incentive for development and also maintenance over the long run of the Park." Unmaintained singletrack trails are frustrating for riders and will quickly diminish the visitor experience, steering users toward other places with more predictable riding conditions.
9. Clarification of the Purpose Section of the Guidance: The purposes stated by staff during the August APA Board meeting should be included in Section I of the document, as follows, to comprehensively outline the intent and goals:
  - a. Creates consistency at multiple levels of management and planning;
  - b. Serves as the foundation for a common understanding of the activity and it's users;
  - c. Directs new trail development to locations with the right set of conditions; and,
  - d. Clarifies ambiguous terms such as "Singletrack" and "Doubletrack", and puts them into context.The guidance should include in the Purpose section (b) a statement of intent to offset the expanded mechanized recreation with new opportunities for passive recreation.
10. Trail Density, Carrying Capacity, and Overuse: It should be explicitly clear that trails should not be in or immediately adjacent to wetlands, or built by filling in wetlands. The Council also believes DEC needs to formulate a system for formal data collection

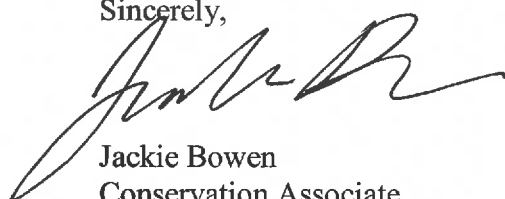


methods and reporting mechanisms that address how trail density and carrying capacity will affect natural resources, the visitor use experience, and user conflicts. Currently, the guidance document ambiguously alludes to developing a monitoring and data collection plan *only* if recreational uses begin to conflict. The value of implementing these plans as an early component of the trail building process allows for baseline data to be acquired that can proactively define a trail's carrying capacity and user density to address overuse or conflicts before it occurs. This data can then become a fundamental tool for natural resource managers to use as issues become evident. Conversely, if no significant issues arise over a period of time, this data collection and monitoring can then be scaled back to an appropriate level or eventually be discontinued. The development of this management document, coupled with the low number of trails across the Park, presents DEC with a unique opportunity to begin addressing carrying capacity and overuse issues before they begin to occur.

11. **Non-Motorized Trail Maintenance:** In Section V, the guidelines should distinguish that for routine maintenance, such as cleaning of ditches and clearing of brush, the use of non-motorized vehicles is preferential.

In closing, the Adirondack Council supports the prudent development of these guidelines as DEC and APA seek to protect natural resources and landscapes while encouraging singletrack mountain biking opportunities where appropriate on Forest Preserve that is and should be classified as Wild Forest. With the above changes, the document can comprehensively and effectively guide singletrack bike trail siting, construction and maintenance in those Wild Forest areas where this recreational use is gaining popularity and identify new and appropriate riding places for all ability levels. Thank you for reviewing our comments. We look forward to your response.

Sincerely,



Jackie Bowen  
Conservation Associate

**Image 1:**



**Image 2:**



**Image 3:**



**Image 4:**



**From:** Jeffrey Meyers <jeffrey.meyers@gmail.com>  
**Sent:** Tuesday, September 26, 2017 1:57 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** MANAGEMENT GUIDANCE

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Hi -

I am writing in support of mountain bicycling in the Adirondack Park and to voice my support of the MANAGEMENT GUIDANCE SITING, CONSTRUCTION AND MAINTENANCE OF SINGLETRACK BIKE TRAILS ON FOREST PRESERVE LANDS IN THE ADIRONDACK AND CATSKILL PARKS.

Mountain bicycling is an excellent way of staying fit and healthy and enjoying the wonderful resources in the Adirondack Park and elsewhere. In my opinion, the Management Guidance does an excellent job of balancing the protection of natural resources while accommodating mountain bike use. I strongly support this plan and hope it will be adopted.

Thank you for considering my comments.

Jeffrey Meyers  
2833 Whitmyer Drive  
Niskayuna, NY 12309

**From:** John Menna <jamenna@gmail.com>  
**Sent:** Friday, August 25, 2017 8:58 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** SINGLETRACK BIKE TRAILS ON FOREST PRESERVE LANDS

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

I write regarding the proposed Bicycle Trail Guidance for the Adirondack Park. I have read the proposal for the expansion of bike trails in the Adirondack Park and I am against such an expansion.

I have seen the effects of these kinds of trails on other wild areas around the country. They promote increased litter, noise, erosion and wildlife disturbance. A sample of the damage I have seen:

- trails widened out to the size of a road;
- collisions between hikers and bikers;
- cutting of trees to create ramps and corduroy roads;
- illegal flagging throughout the forest to guide high speed cyclists;
- dead zones that are devoid of normal fauna;

I enjoy road and off-road cycling. However, if these trails are put in place, the Adirondack Wild Forests will see a degradation of the environment and enjoyment of hikers, hunters and skiers. Any expansion will quickly and severely change the nature of the forest to the detriment of fauna and other users.

Sincerely,

John A. Menna

Buffalo, NY 14222

**From:** kazlp@roadrunner.com  
**Sent:** Thursday, August 24, 2017 4:59 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** New MTB Trails

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

I think that Dewey Mt may have some trail-building lessons. Drainage on the lower half is poor. It's rained a lot this summer, but even after a dry week those mtb trails can still have muddy patches. Also, the stacked loops there may be too close, because in the autumn the different sections can become completely blurred. I think that all of these trails- red, purple, yellow, green, blue, fall within the middle three categories (easy, moderate, very difficult) as most any new mtb trails should.

I think that DH/FR trails, like pmd in Wilmington, are the least efficient because they require a lift, shuttle, or separate trail to climb. The Marble Mountain trail, connected to pmd, takes a while. Pmd is bikable uphill but this is also, I think, a bad idea given opportunities for disaster. The Pisgah flow trail is well planned given all the single track on both sides.

The most efficient PFT's, if I understand the concept correctly, are log/rock based jumps that are just wide of the main trail. They take up only a few extra feet of space. Concerning insloped corners, the new Ante up trail at Hardy road is, I think, well designed because the sharper turns are smooth and slightly insloped.

**From:** kazlp@roadrunner.com  
**Sent:** Wednesday, August 30, 2017 9:25 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** MTB trails

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

It seems that there are lots of trails underdeveloped which, with additional grooming but minimal cutting, could make for good single-track. Around Lake Placid, Heaven Hill trails and new trails at Mt van Hoevenberg are good examples of this. Other trails which may also benefit from such attention are the following:

The truck path towards the end of Perkins road off Hardy road; in Onchiota, paths off North Branch Road and the hunters' camps, off Oregon Plains road and the Bloomingdale-bog trail, and the mountain trail between Lake Kushaqua and Buck Pond. There are other paths there leading down to the lake.

From the Hays Brook assembly area near Paul Smiths, paths overgrown from the preexisting bike trails, and trails on the west side of rt 30 from Mountain Pond/Slush Pond road. Of course, Paul Smiths operates trails where I think bikes are not officially allowed. There's also a long and wide bike path leading from Meacham Lake Campground and Debar Mt which is poorly maintained.

In Keene there are paths around the horse grounds at the Barkeater, and sections of the Jackrabbit at the dead end. Cascade ski currently bars bikes for the swampiness. In Lake Placid, there are some trails in the McKenzie area off the west bank of the lake. They stretch between Whiteface Lodge and Whiteface Mt. I think the trails off Connery Pond are currently off limits to bikes-same for those off Corey's road and Upper Saranac Lake.

However, there are trails in SL off Baker Mt/Moody pond which may benefit from further developement, and the old railroad tracks which will be pulled.



**From:** kenny boettger <boettgerkenny1@gmail.com>  
**Sent:** Tuesday, September 26, 2017 12:33 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Trail building guidelines

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Ms Regan,

I am writing to express my support of BETAs support of the proposed trail building guidelines for the Adirondack and Catskill Parks.

BETA has shown an incredible vision and ability to promote biking and other uses in our park by designing, building and maintaining legal trails.

Thank you,

Kenny Boettger

Placid Planet Bicycles

Likely sent from someplace fun.



**From:** Kevin Ballou <kgballou@gmail.com>  
**Sent:** Monday, September 25, 2017 4:18 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** APA Mountain Bike trail guidance

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

I am just emailing in support of the APA mountain bike trail guidance. I think the APA should follow in the footsteps of Vermont and build eco friendly sustainable and fun biking trails. It brings extra tourism dollars to the AP and in a low ecological footprint manner.

Regards,

Kevin Ballou

**From:** M Quirk <outdoorswoman@hotmail.com>  
**Sent:** Thursday, August 24, 2017 9:38 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Mountain biking in Wild Forests

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

I'm an avid mountain bike and ride with a very large community of fellow mountain bikers. These are people who ski, hike/backpack, rode bike, rock climb, run and are nothing but environmental advocates for preservation. I've biked in many designated biking areas as well as areas not defined specifically for mountain biking. Mountain biking is a very large populace of amazing folks who can be a resource for several reasons.

Mountain bikers are the eyes and ears for wild forest preservation.

\*They steward the land...pick up garbage, deter inappropriate behaviors by those in the woods for beer parties and illegal camping, etc.

\*We would report more of what we see if it was legal to ride there.

\*Do not incur much of an environmental impact other than to roll over dirt, rocks and roots.

\*Volunteer often to improve/manage trails and we are a large populace to call upon for this so we are a resource beyond your paid ranger and crew.

\*Mountain biking and hiking DO mix. In Sedona we shared trails with horses, hikers and bikers. These people all have a common respect for being in the outdoors. It was amazing to experience.

After 2 miles or so out in any direction, there are very few meetings of people and it works great! Why were trails ever separately designated in the first place, other than for terrain conditions?

I'd be happy to provide more info, go to meetings and get involved and SO many folks care about doing the right thing.

Responsible outdoor activities that preserve our environment and spread the interests of all in all trails.

Michele Hanley

*Sent from my Verizon Wireless 4G LTE DROID*

**From:** mariesmallman3@gmail.com  
**Sent:** Thursday, August 24, 2017 8:30 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** ADK Single track trails

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Dear Kathy,

I am a 50 year old mt. biker and recently was informed about the possible trail system in the Adirondack park. I have lived in upstate NY my entire life and have been mt. biking for the past 15 years.

We have some wonderful trails around my area and we use them more than once a week. We travel at least twice a season to North East Vermont for no shorter than 4 day trips. The town there is so welcoming to bikers which is why it is such a big draw to hundreds of bikers from U.S. and Canada.

I am writing to implore you to move forward with the proposed trail system as it will keep riders here in our own beloved state when choosing a biking destination.

I believe the Adirondack park is big enough for all outdoor enthusiasts to share peacefully. I find that the majority of mt. bike riders are respectful regarding nature and are passionate about preserving it.

I would love nothing more than to drive up the beautiful NYS Northway to my riding destination then stop at one of the local eateries and breweries when I am done.

Thank you for your consideration.

Sincerely,

Marie Smallman  
Waterford, NY

**From:** Matt VanSlyke <matt@cycleadirondacks.com>  
**Sent:** Monday, September 25, 2017 1:26 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Cc:** Doug Haney; Josh Wilson  
**Subject:** Comments on Mountain Bike Trail Design Guidance  
**Attachments:** Trail Guidance.pdf

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Dear Ms. Regan,

Please find the attached letter regarding the call for public comment on mountain bike trail design within the Forest Preserve.

Thank you for your consideration,

Matt VanSyke

**Matt VanSlyke**  
Co-Director, Cycle Adirondacks  
315.525.9554 | [matt@cycleadirondacks.com](mailto:matt@cycleadirondacks.com)<http://cycleadirondacks.com>





September 25, 2017

Kathy Regan  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

Dear Ms. Regan:

We are writing to offer support and gratitude to the APA and NYSDEC in its proactive approach to guiding the development and maintenance of mountain biking trails within the Forest Preserve. As the operator of a bicycle touring company, we are keenly aware of the economic and community benefit that bicycle tourism can provide in our communities. However, we're also fully aware that the economic impact from tourism in the Park is heavily dependent on the effective management and protection of our sensitive natural environment. It is our firm belief that we cannot have one without the other.

Therefore, we are pleased to have received notice of the Department's Management Guidance on the SITING, CONSTRUCTION AND MAINTENANCE OF SINGLETRACK BIKE TRAILS ON FOREST PRESERVE LANDS IN THE ADIRONDACK AND CATSKILL PARKS. The best practices cited in this document will, if adhered to, serve the dual purpose of providing recreational access while balancing the need for natural resource protection.

Thank you for this ongoing dialogue and support for the recreational activities that we enjoy as residents and depend on for our livelihood.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Matt VanSlyke'.

**Matt VanSlyke**  
Co-Director, Cycle Adirondacks  
[matt@cycleadirondacks.com](mailto:matt@cycleadirondacks.com)

A handwritten signature in blue ink, appearing to read 'Doug Haney'.

**Doug Haney**  
Co-Director, Cycle Adirondacks  
[doug@cycleadirondacks.com](mailto:doug@cycleadirondacks.com)

**From:** michael vitti <sick4surf@yahoo.com>  
**Sent:** Wednesday, September 27, 2017 5:29 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Adirondack Bike Trail Guidelines

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Kathy Regan  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977  
Fax: [518-891-3938](tel:518-891-3938)  
Email - [SLMP\\_Comments@apa.ny.gov](mailto:SLMP_Comments@apa.ny.gov)

To whom it may concern,

This is a letter of support for your sustainable Trail design guidelines for wild forests of the Adirondack region.

There is plenty of information put out by IMBA that I'm sure you will incorporate into your plan. It's important to build a quality trail experience into any recreational trail. This is important because if the users love the trail experience they are more inclined to help maintain the trail.

I am a member of the state Trails council which meets twice a year in the Albany area to discuss statewide Trail policy and to provide input. If you need to tap into our years of experience please reach out to us.

I am aware that you are in good hands with the BARKEATERS TRAILS ALLIANCE. We support their work.

CLIMB is a Long Island based Mountain Bike organization that has built and currently maintains over 175 miles of single track Trails since 1990. Many of our members like to travel to other areas to spend our tourism dollars. Currently there are not enough Trails in the Adirondack area to warrant a trip but we look forward to the creation of more Mountain Bike opportunities in the Adirondack area.

Happy trails,

Michael Vitti  
CLIMB President  
<http://www.CLIMBonline.org>  
NY State Trails Council Member  
516-510-4392

[Sent from Yahoo Mail for iPhone](#)

**From:** Mike Feldman <riosacandaga@yahoo.com>  
**Sent:** Monday, September 25, 2017 9:23 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Cc:** Seleen, Kirstin L (DEC)  
**Subject:** Proposed Singletrack Bike Trails on the Adirondack Forest Preserve

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Kathy Regan, NYS Adirondack Park Agency, PO Box 99, Ray Brook, NY 12997 or emailed to [SLMP\\_Comments@apa.ny.gov](mailto:SLMP_Comments@apa.ny.gov).

Dear Ms. Regan:

Thank you for the opportunity to comment on single-track bike trails in the Adirondacks. I have read your trail building plans and they are very sound and thorough. I have personally constructed over 10 miles of single-track trails on my property in southern Hamilton County in the town of Benson. My trails are open to the public and frequently used by local groups including the Adirondack Velo Club and the Northville Central School District mountain bike club. Additionally many local residents ride and hike on my property as well as folks from Boston, Buffalo, NYC and the Southern Tier of NYS. They have become quite popular not only because of the flow design but also the sustainability using the same techniques outlined in your document.

While stacked loops have expanded somewhat in the Adirondacks with trails being added in the Wilmington area through cooperative efforts lead by BETA, there are also more trails opening up at the North Creek Ski bowl, Gurney Lanes and a proposal for trails in the Moose River Plains.

It is worth noting that destination riding and connecting communities via single track is lacking in the Adirondacks. There is a grass routes effort to create a 600 mile circumferential loop of the Adirondacks that connects a village or town every 75-100 miles called the Adirondack Trail Ride. The first Friday after Labor Day there is a limited grand depart where riders go head to head in a self supported low impact bike packing race. Having completed the route I can attest to the difficult terrain covered. Most of the route is on old snowmobile and ATV trails- suboptimal mountain biking, but as of now that's the best that can be mustered. About 200 miles are on secondary roads and pavement to connect the trail sections. Clearly a single-track network is needed.

With that I'd like to commend the DEC land manager, Kirstin Seleen, for the Wilcox Lake Wild Forrest for her forward thinking and commitment to enhancing the trails in that area to support bikepacking. The potential is amazing! A 26 mile and 45 mile loop with connector trails to Northville via Hope Falls, Wells, Johnsburg/North Creek, Thurman, Harrisburg/ Stony Creek. This would be an ideal network with minimal resources allocation as the existing trails are cut and need only be "buffed" in certain areas and shifted out of areas that are wet and already eroded.

Again, thank you for the opportunity to comment and I look forward to eventually riding some new trails in our great park!

Mike Feldman  
205 River Road  
Northville, NY 12134



**From:** Paul Winkeller <paul@nybc.net>  
**Sent:** Tuesday, September 26, 2017 10:40 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** NYBC Supports New Guidance Re Single Track Bike Trails

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

TO WHOM IT MAY CONCERN AT APA and DEC:

The New York Bicycling Coalition enthusiastically support the smart guidance - emphasizing sustainability and minimal impact on important State Forest Preserve natural resources - being proposed in order to provide reasonable access for single track trail building and bicycle use.

This smart and green approach to trail building responds to growing interest in local, regional AND destination mountain biking in New York State - with an attendant and important bike based tourism economic development impact.

Additionally, at the recent inaugural New York Bike Summit in Albany on September 15th, one of the most popular sessions was about bridges, as "completers" and "connectors" of road and trail systems, particularly in the context of a growing focus on infrastructure maintenance and improvement. *We encourage the APA, DEC and other stakeholders driving this new guidance forward to pay special attention to bridges!*

Thank you for this opportunity to comment!

--

PSW

Paul Winkeller, Executive Director  
New York Bicycling Coalition  
[www.nybc.net](http://www.nybc.net)  
518.330-6301  
[paul@nybc.net](mailto:paul@nybc.net)

Hai Voluto la bicicletta - adesso pedala!

[Join NYBC today and help us make New York a more bicycle-friendly state](#)

**From:** pbhai@newcombny.com  
**Sent:** Friday, September 29, 2017 8:38 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Cc:** wester.miga@frontiernet.net  
**Subject:** Comment submission MTB guidelines  
**Attachments:** Town of Newcomb APA MTBGuidance ltr.pdf

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Good morning,

I am forwarding on behalf of the Town of Newcomb official comments on the draft management guidelines relating to biking on Wild Forest lands in the Forest Preserve.

Please acknowledge receipt of this email and the attachement.

Thank you

**Wester Miga**  
Supervisor

**Mary Pound**  
Town Clerk

**Mark Yandon**  
Supt. of Highways

**Karen Darrah**  
Tax Collector

**Robert Ward**  
Town Justice

## Town of Newcomb

Box 405  
Newcomb, NY 12852

*"Heart of the Park"*



*Town Board*  
**David Olbert**  
**Donald Bott**  
**Joseph Novak**  
**Paul Hai**

*Assessors*  
**Lowell Stringer, Chrm**  
**Edna VanAuken**  
**Jennifer Fifield**

**Kathy Regan**  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

September 29, 2017

Deputy Director Regan,

By this letter the Town of Newcomb expresses its support of the August 2017 draft ***Management Guidance for the Siting, Construction and Maintenance of Singletrack Bike Trails on Forest Preserve Lands in the Adirondack Park.***

The Town of Newcomb appreciates the time, effort, and careful consideration of APA and DEC staff reflected in the draft guidelines and supports their adoption and immediate implementation.

In addition to the great work and guidelines recommended for the creation of singletrack riding experiences in Wild Forest settings, the Town of Newcomb hopes for, and strongly encourages the APA and DEC to elevate the development of guidelines, review of inventory and establishment of biking on doubletrack/existing forest roads in Wild Forest settings.

While the draft guidelines state *"Additionally, doubletrack is generally less desirable to mountain bikers seeking a more intimate and engaging experience along a narrow trail."* this only represents the interests of the most experienced and/or elite of the mountain biking community. The Town of Newcomb is committed to the idea that experts only develop from entry level exposure and experiences, often when young and with one's family.

It is imperative the state create and/or provide sanctioned and managed biking experiences on Wild Forest lands for a wide range of skill levels. By useful comparison, neither White Face

Mountain nor Gore Mountain, both owned and operated by the State, are comprised solely of black diamond runs because that is the preferred terrain of advanced skiers.

Existing forest roads represent an enormous state resource and asset for providing entry level and doubletrack experiences for children and families. In addition, research has shown early family-based recreational experiences leads to greater life-long engagement in nature-based recreational activities as well as life-long support for the forest preserve.

Equally important to fostering a strong use and stewardship ethic in the next generation, family-based recreational opportunities have a direct positive impact on the economics of Adirondack towns and villages where these opportunities are available. The Town of Newcomb supports the APA and DEC reviewing and opening all appropriate forest roads in Wild Forest settings to biking.

Thank you for your consideration of this letter and the perspectives of the Town of Newcomb.

Sincerely,

A handwritten signature in black ink, appearing to read "Wester Miga". The signature is fluid and cursive, with the first name "Wester" and last name "Miga" clearly distinguishable.

Wester Miga,  
Supervisor, Town of Newcomb



**From:** Regan, Kathleen D (APA)  
**Sent:** Monday, October 02, 2017 8:51 AM  
**To:** Palmer, Mary B (APA); McNamara, Matthew R (APA)  
**Subject:** FW: BETA Comments on MTB Trail Guidelines  
**Attachments:** BETA\_MTB Trail Guidelines\_Comments Sept 29 2017\_FINAL.docx

Not sure if this came in proper channels as well?

---

**From:** Josh Wilson [<mailto:betatrails@gmail.com>]  
**Sent:** Friday, September 29, 2017 3:47 PM  
**To:** Regan, Kathleen D (APA) <[Kathleen.Regan@apa.ny.gov](mailto:Kathleen.Regan@apa.ny.gov)>  
**Cc:** Guglielmi, Steve J (DEC) <[steve.guglielmi@dec.ny.gov](mailto:steve.guglielmi@dec.ny.gov)>; Daley, Robert J (DEC) <[robert.daley@dec.ny.gov](mailto:robert.daley@dec.ny.gov)>; Alberga, Kristofer A (DEC) <[kristofer.alberga@dec.ny.gov](mailto:kristofer.alberga@dec.ny.gov)>  
**Subject:** Re: BETA Comments on MTB Trail Guidelines

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Oops...caught a small but important typo. Please refer to this attachment. Sorry, Josh

Josh Wilson  
Executive Director  
Barkeater Trails Alliance (BETA)  
*(formerly the Adirondack Ski Touring Council)*  
[www.BETATrails.org](http://www.BETATrails.org)  
518.523.1365

On Fri, Sep 29, 2017 at 3:20 PM, Josh Wilson <[betatrails@gmail.com](mailto:betatrails@gmail.com)> wrote:

Hi Kathy,

Attached please find our comments on the Draft Guidelines for Single Track Bike Trails.

Thank you for the opportunity to comment on this important resource.

Cheers,  
Josh

Josh Wilson  
Executive Director  
Barkeater Trails Alliance (BETA)  
*(formerly the Adirondack Ski Touring Council)*  
[www.BETATrails.org](http://www.BETATrails.org)  
[518.523.1365](tel:518.523.1365)



## **BARKEATER TRAILS ALLIANCE (BETA)**

P.O. Box 843  
Lake Placid, NY 12946  
(518) 523-1365 ~ [betatrails@gmail.com](mailto:betatrails@gmail.com)  
**BETAtrails.org~ JackrabbitTrail.org**

September 29, 2017

Kathy Regan  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

On behalf of the directors and members of the Barkeater Trails Alliance (BETA), I respectfully submit the following comments on the Draft Management Guidance for the siting, construction, and maintenance of single track bike trails on Forest Preserve lands in the Adirondack Park, herein referred to as the "Draft Guidelines".

The Adirondack Park State Land Master Plan (SLMP) was amended in 1986 to include guidelines for mountain bike use, and a more specific policy was written in 1993 by the Adirondack Park Agency (APA) and Department of Environmental Conservation (DEC). The 1993 MOU stated (in part) that the DEC would "study bicycle use in the Adirondack Forest Preserve and fully assess the environmental and social impacts of bicycles, as well as the physical constraints on their safe use." The policy went on to say that the result of this study would be "a set of guidelines or criteria for trail designation which will be jointly adopted by the Agency and Department, and a network of trails which meet these criteria." BETA congratulates the APA and DEC for finally taking steps to develop guidelines for mountain bike trails.

The trails in the Wilmington Wild Forest are a great example of a carefully designed and constructed mountain bike trail network, maintained by local users, which is quickly becoming a destination for visiting bicyclists and providing an economic boost for the community. The experience in Wilmington has taught us that with good trail design and high-quality construction and maintenance practices, mountain biking can be successfully accommodated in Wild Forest areas while preserving the "forever wild" character of the Forest Preserve, mitigating potential impacts to natural resources and minimizing user conflict. In fact, though most of the trails were designed and built for mountain biking, we have clearly seen that the trail systems have become popular for all kinds of human-powered activities. Minimizing user conflict is a top priority for BETA, since all of our members are active in a variety of different recreational activities, and understand the importance of preserving a quality experience for all trail users.

BETA's recommendations below are based on the knowledge and work experience of our staff and volunteer trail crews who are currently responsible for planning, constructing and maintaining mountain bike trails in the Wilmington Wild Forest and Saranac Lakes Wild Forest under a volunteer stewardship agreement with the NYSDEC.

### Single Track vs. Double Track

We believe, and the evidence supports, that well-built single track trail systems are what most mountain bike enthusiasts are seeking, as opposed to off-road cycling on dirt roads and "double track." BETA praises the APA and DEC staff for recognizing this distinction in the Draft Guidance.

### Trail Rating Systems & Characteristics

BETA supports using the *IMBA Trail Solutions* Trail Rating matrix referenced in the Draft Guidelines. The standards and characteristics in the matrix provide a consistent and systematic framework when planning new trail networks and assessing difficulty of existing trails. Mountain biking trail systems should be *diverse* to provide opportunities for riders of various abilities – from easy, low-angle trails for beginners to technical, rocky trails for experts.

### Riding Opportunities

BETA agrees with the Draft Guidelines for "Riding Opportunities" as written for Stacked Loop, Long Distance Tour, Winter Cycling and Freeride/Downhill. While the terminology might be new to some, the concept of so called "stacked loops" and "long distance tours" in mountain bike trail development have been around for some time and have already informed the planning and development of trail systems in multiple Forest Preserve units. For example, in the Wilmington Wild Forest, the Beaver Brook (Hardy Rd) trails are a textbook example of a stacked loop system. The Cooper Kiln trail is an example of a long-distance tour which provides a more remote, backcountry experience that is not often available to mountain bikers given the prohibition on mountain biking in designated Wilderness areas. We agree that so called "Freeride/Downhill" trails are only appropriate in Forest Preserve areas classified as Intensive Use.

Winter cycling, aka Fat Biking, is becoming more popular in the Adirondack Park. BETA supports and encourages the use of single track bike trails for winter cycling. Motorized or human-powered "grooming" of trails to facilitate winter cycling is common across the country. Motorized grooming usually means using a snowmobile or other tracked machine to create a packed tread for fat bikes. Human-powered grooming usually entails simply walking on the trail with snowshoes to pack down the tread. Both techniques produce a similar result. Grooming is typically reserved for those times when abundant fresh snow makes it difficult to navigate the trail on a bike.

**BETA does not support the use of motorized grooming equipment of any kind on single track bike trails in the Forest Preserve for the purpose of facilitating winter cycling. The Draft Guidelines should clearly state that motorized grooming of single track trails on Forest Preserve is prohibited.**

#### Section IV Guidelines for Trail Design & Construction

BETA fully supports all of the guidelines outlined in Section IV. Most importantly, we agree that the planning of new trail alignments should be done in consultation with mountain bikers. Understanding exactly “how” a new trail will be used by mountain bikers (or what the riding experience will be like) is not easy for people who do not commonly engage in the activity. Good stakeholder engagement is critical to the success and sustainability of all trail systems. Even if constructed to the highest building standards, a trail that is poorly aligned and designed will not provide a quality experience.

Specifically, we strongly support the inclusion of Parallel Trail Features and Insloped Corners in the Draft Guidance. Both of these trail features are by now a widely accepted and expected element of a well-designed trail system. Parallel Trail Features provide an element of fun and challenge for riders, and if constructed in accordance with the Draft Guidelines can be accommodated on Forest Preserve trails without detracting from the experience of other users or negatively impacting natural resources. Insloped corners (often called berms) are critical features on most mountain bike trails that help reduce skidding and trail braiding (and therefore erosion) while simultaneously providing an element that contributes to a positive rider experience.

Our only complaint with the Draft Guidelines in Section IV is that it does not consider the design and construction of bridges for single track mountain bike trails. Even in the most ideal terrain and conditions for mountain bike trail development, it is inevitable that some bridging will be required to cross streams, seasonal drainages or persistently wet areas that cannot be avoided in the trail alignment process. Even on the best trail, a poorly designed and/or poorly constructed bridge has the potential to negatively impact the user experience. Approaching and using a trail bridge is much different on a bike than on foot.

Bridges on single track trails can range from simple “boardwalk” style bog bridging constructed of minimal dimensional lumber and placed low to the ground, to more substantial bridges with spans of 8 feet or more across streams which require more intensive construction. By necessity, bridge design and construction must be based primarily on the characteristics of the bridge site and the trail on which it is located. The Draft Guidelines should state the importance of the following:

- Using bridge designs that are consistent with the trail’s difficulty rating
- Using a “minimum tool” approach to bridge design decisions, in accordance with the APA/DEC “Appendix G - Minimum Requirements Approach Guide Construction of Trail Bridges in Wild Forest Areas in the Adirondack Park”
- Consider aesthetics - Appendix G states “On the Forest Preserve, structures should blend in and be compatible with their surroundings.”



Additionally, in order to provide a quality experience for trail users, bridges should be “bicycle friendly” whenever possible. This means providing a smooth and easy transition from the trail tread surface to the bridge surface and back to the tread surface. In other words, a bicycle tire should be able to roll onto the bridge surface with minimal effort or maneuvering. Below we provide a series of photos to demonstrate the difference between a bicycle-friendly bridge and one that was not designed to easily accommodate bicycle use. All photos are from trails constructed in 2017 at the Flume area in the Wilmington Wild Forest.

**Photo A** - A bridge constructed by BETA trail crew on the Ridge Connector trail. Note that the bridge surface is on the same elevation as the trail tread. Bridge sills are placed below grade but well above the water line and outside the drainage being crossed. Mountain bike tires will easily roll onto the bridge surface from the trail. Whenever possible, this is the preferred design for bridges on mountain bike trails of all difficulty levels.





**Photo B** - Close-up view of the same bridge, showing the transition between the tread and the bridge surface and placement of the bridge sills below grade.



**Photo C** - Bridge constructed by Student Conservation Association crews on the new “lower connector” trail between the Flume network and the “Poor Man’s Downhill” trail (Wilmington Snowmobile Trail). Note that the bridge surface is much higher than the trail tread surface. Bridge sills are placed above grade. Rocks are piled to provide a base for an approach ramp that has not been added yet. A bridge designed in this fashion requires significant additional work on the part of trail crews who must use rock armoring and soil to construct an approach ramp so that mountain bikers can ride on and off the bridge. Even with a ramp, the transition from trail to bridge is more difficult and not as enjoyable. While this design may be perfectly acceptable on “hiking only” trails, it is by no means bicycle-friendly and requires more effort and terrain manipulation to construct than is often necessary or desirable.





**Photo D** - A different bridge constructed by the SCA trail crew at the Flume using the same “elevated” design. Note how much soil must be used to create an approach ramp (and this ramp is not finished). While this type of bridge design is sometimes necessary to avoid an obstacle in the trail and/or stream being crossed, it should be avoided if possible.



## Section V Guidelines for Trail Maintenance

BETA supports the general guidelines set forth for mountain bike trail maintenance. Specifically we believe it is important to include periodic removal of loose organic matter (leaves and other debris) in the maintenance guidelines. This can be accomplished using hand tools such as leaf rakes and is an important maintenance activity for mountain bike trails, especially in the spring and fall seasons. This practice helps to maintain a defined, narrow tread, makes it possible for riders to see obstacles such as large rocks and roots that may be hidden by leaves, and prevents trail braiding that often results when riders are unable to follow a trail which is covered with a blanket of fallen leaf litter.

## Trail Design Resources

The Draft Guidelines cite various trail design and construction guidelines developed by the International Mountain Bike Association (IMBA). For decades, IMBA has been recognized as the authority on this topic, and for good reason. BETA frequently refers to IMBA guidelines for all of our trail design and construction projects on Forest Preserve, private and municipal lands. These guidelines should continue to be used so long as they conform to the State Land Master Plan.

We respectfully suggest that APA and DEC consider a new resource for mountain bike trail development that was recently developed and released in January 2017 by IMBA in collaboration with the federal Bureau of Land Management (BLM), called [“Guidelines for a Quality Trail Experience.”](#)

Of course we understand that the Adirondack Forest Preserve is managed much differently than federal forest lands under the jurisdiction of the BLM. However, that does not prevent us from considering these modern trail building guidelines in the context of the Forest Preserve. Certainly there are trail design features and construction practices contained in these IMBA-BLM guidelines that have no place in the Forest Preserve. But these new guidelines are very clear in differentiating between the kind of natural trail features found on “primitive and backcountry” trails and those riders are likely to encounter in a more engineered setting like a bike park or urban trail system.

Perhaps the most notable component of these IMBA guidelines is the use of high quality photos and graphics to clearly depict trail design features in a way that helps the reader visualize how a mountain bike rider actually interacts with said feature on a real trail (rather than a textbook drawing which is difficult to visualize when considered out of context).

## Conclusion

BETA fully supports the Draft Guidelines and commends APA and DEC for acknowledging the importance of establishing a clear standard for the construction of single track trails in the Forest Preserve. If adopted the guidelines will provide a benchmark for new trail construction that BETA and other trail organizations can easily follow. This is an important step toward ensuring that mountain biking continues to be meaningfully accommodated as a legitimate use of state-owned Wild Forest lands in the Adirondack Park.

Thank you for the opportunity to comment on this important topic.

Sincerely,

Josh Wilson  
Executive Director



**From:** Richard Bryan <richard@probate.nyc>  
**Sent:** Tuesday, September 19, 2017 8:26 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Public Comment: August 2017 Management Guidance "Singletrack Bike Trails"

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

I am writing to comment on the draft Management Guidance dated August 2017 "Siting, Construction and Maintenance of Singletrack Bike Trails on Forest Preserve Lands in the Adirondack Park."

The Guidance is extraordinary well-written by persons obviously committed to ensuring meaningful access to Forest Preserve Lands for mountain bike cyclists, while at the same time deeply concerned with protecting the sensitive areas of the Adirondack Park. Thank you for this effort.

My comment is a suggestion that the Management Guidance incorporate ways to promote successful "bikepacking" in the Park. As the name implies, bikepacking is a mix of mountain bicycling and backpacking, and was named "the traveling trend of 2017" by Lonely Planet. (See generally, "The Ride of Your Life," AMC Outdoors Magazine September/October 2017, p. 27 (Galbraith, S. and Von Duntz, T.)). Importantly, bikepacking is a way that persons with limited mobility can travel further into the Park; set up an overnight camp using conventional backpacking equipment, and set out the next morning for either a new destination, or a return trip to the parking lot. Additionally, since children and pre-teens rarely have the stamina to backpack with their parents, bikepacking enables more families to enjoy an overnight campout. Parents can easily carry on their mountain bikes the equipment needed for a one or two day campout, while the children have the fun of bicycling along dirt trails. What kid wouldn't enjoy that?!

Specifically, I suggest that some portion of the planned mountain bike trails direct riders to existing overnight camping locations, or that additional overnight camping areas are added along the planned mountain bike trails. The latter will avoid any potential for over-crowding of existing shelters and primitive camping locations favored by backpackers. For the time-being, since it is not yet clear how popular bikepacking will be in the Park, only a few new primitive camping locations need to be sited. If it turns out that demand is greater than supply, this situation can be addressed in the future. However, providing some access for bikepacking opportunities in the Adirondack Park will at least provide some support to this new trend in outdoor enjoyment.

Thank you.

Richard Bryan  
New York, NY

**From:** Richard Carlson <diccarlson@frontiernet.net>  
**Sent:** Friday, September 29, 2017 10:10 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Singletrack Mt. Bike Trail Construction Comments

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Kathy Regan  
Deputy Director for Planning  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

September 29, 2017

Greetings - Comments submitted for:

*MANAGEMENT GUIDANCE SITING, CONSTRUCTION AND MAINTENANCE OF SINGLETRACK BIKE TRAILS ON FOREST PRESERVE LANDS IN THE ADIRONDACK PARK, NYS DEC, August 2017*

*Mountain bikers generally prefer riding on singletrack trails designed specifically for mountain biking1.*

**Comment:** Most mountain bikers would prefer a mixture of trail types for an overall riding experience.

*Former woods roads and multiple use trails will continue to be an important part of the Forest Preserve trail network open to bikes. However, singletrack trails designed and built for mountain biking on lands classified as Wild Forest is the focus of this guidance.*

**Comment:** New singletrack trail construction is covered well in this document, but the majority of trails in wild forest today are multiple use trails - used for access, hiking, skiing, snowmobiling and mountain biking. Some of these trails are legacy snowmobile trails that have become little used (due to light snow years and a lack of grooming) and could be rehabilitated to accommodate mountain bike use and to increase attractiveness for all other uses. Many snowmobile trails have used routes that cross water and wetlands (which freeze in winter) that could be rerouted to accommodate bicycle and hiking use in the warm seasons. These snowmobile trails have a great hamlet and village connection potential - one example is the Southern Adirondacks where these trails connect the Lake George area all the way to Speculator/Lake Pleasant.

The concept of mountain bike only use is limiting and narrow. Most all trails in Forest Preserve should have multiple use philosophy as a core development directive. That said, if an established mountain bike trail system that might exist on municipal or private land needs Forest Preserve holdings to expand or connect with other trails - these guidelines are welcome and invaluable. Existing and new Mt. Bike Designated Trails should be designed or redesigned and optimized for that use with a trail tread established, especially on multiple use trails.

*Submitted by Richard Carlson 9/29/17  
for The Upper Hudson Trails Alliance (UHTA)  
<http://upperhudsontrails.org/>*

--  
Richard Carlson  
PO Box 73  
North River, NY 12856  
518-251-0829

**From:** richard williams <oldcrowrich@gmail.com>  
**Sent:** Monday, September 25, 2017 11:11 AM  
**To:** SLMP\_Comments@apa.ny.gov; Seleen, Kirstin L (DEC)  
**Subject:** Singletrack Bike Trails on the Adirondack Forest Preserve

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

I love the idea of having singletrack trails on the Adirondack Forest Preserve.

I have seen an increase in people from our small bike club (Adirondack Velo Club) that want to and like to go Mountain biking. I think the biggest reason being that they don't have to worry about getting hit by a vehicle.

In my opinion the Adirondack has a very unique opportunity to provide both the stacked looped networks and the long distance tour.

The stacked loops are nice for providing a wide range of riding abilities and distances. I really enjoy the stacked loops trails they are great for after work riding and when you have limited time to ride but when you have the time it is nice to get out for a long ride. What the stacked loops lack is that you don't really go anywhere and this is where the long distance trails would be nice to have.

The Adirondacks has the potential to add the long distance rides that could connect communities and other stacked loops together unlike some other states and towns here in the Northeast. Just imagine a mountain bike trail like the Northville Placid trail. Bikepacking is only getting more popular and being able to provide and experience for that with lean-tos and campsites would be great. The Adirondacks already bring in the hikers but if you can also bring in the mountain bikers that would also benefit the economy of the Adirondacks.

Making nice sustainable trails as your proposing that could be groomed in the winter would add the bonus of winter biking which is getting more popular all the time. Stacked trails don't always make for great winter biking but tour trails would. Add tour trails and snowmobile trails together and you could go anywhere in the Adirondacks.

The potential is also there to get snowmobile clubs and bicycle clubs together to help maintain trails. Not all snowmobile trails make for great mountain biking in the summer but together we may be able to improve and maintain some of the same trails for both winter and summer use.

I just do not see a down side !



**From:** Regan, Kathleen D (APA)  
**Sent:** Wednesday, September 20, 2017 11:40 AM  
**To:** Palmer, Mary B (APA); McNamara, Matthew R (APA)  
**Subject:** FW: Bike Trail Guidance comments  
**Attachments:** APADEC bike trail guidance.pdf

---

**From:** S Ovitt [<mailto:wildpropmang@gmail.com>]  
**Sent:** Wednesday, September 20, 2017 11:07 AM  
**To:** Regan, Kathleen D (APA) <[Kathleen.Regan@apa.ny.gov](mailto:Kathleen.Regan@apa.ny.gov)>  
**Subject:** Bike Trail Guidance comments

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Kathy,

I decided to offer some in sites from my experience in the professional development and construction of mountain bike single track in the Adirondacks.

I will mail a copy of this document to your office so you will have it for the file. I thought it might be easier to utilize as an electronic file so it is attached. I hope you find this information useful.

Steve

Wilderness Property Management Inc.

[www.WildernessPropertyManagement.com](http://www.WildernessPropertyManagement.com)

[wildpropmang@gmail.com](mailto:wildpropmang@gmail.com)

Professional Trail Builders Association - member

Steve Ovitt 518 683-2005  
Sylvia Ovitt 518 321-5204

3999 State Rt. 8  
Wevertown, NY 12886



RE: Mountain Bike Trail System Design and Construction Guidance document

Kathy,

I have reviewed the Draft Document and was pleased with the content and general emphasis. I am going to offer some specific information that I feel should be included and emphasized in the guidance document. This information is based on my professional trail construction experience in developing 4 Mountain Bike Park Trail Systems from concept/design and constructing over 25 miles of single track mtn. bike trail in the Adirondack Mountains over the last 5 years. These projects have utilized advanced techniques in sustainable trail design and cover the spectrum of mtn. bike trails from classic cross country hand build to freeride machine build.

1. **The most important aspect in all trail projects is the initial concept, design and layout. This is where all the policy and planning hits the ground and without the professional delivery of design and layout the planning energy was wasted.**

Increase the emphasis on Physical Design and Layout standards by having a stand-alone bold header section covering this subject. This is the most important step in making a trail sustainable, safe, fun, possible and successful. To do this successfully a designer needs knowledge of surveying/engineering, soils, hydrology, forest ecology, sustainable trail construction and riding experience. The proper design and layout prevents the need for lots of trail fixes or a failed project.

The specific items that need to be referenced in Design and Layout are: Grade established along trail corridor by Clinometer, Grade Reversals, Half-Rule (not mentioned and is very important to sustainable trail design), Geology/Soils over the entirety of the trail corridor, Vegetative Cover and density, Site factor determination of the type of turns that can be constructed, Type of trail construction (determines trail tread parameters), Risk/Speed management, Type of riding experience to be created and Targeted Skill Rating for a given trail.

Most of this information is already listed in the document in separate areas and in combination with other concepts/actions. Listing these things separately takes away from the importance of the design and layout action.

2. **Beware of trail comparisons between unlike environments and trail construction standards that were created in environments unlike the Adirondacks.**

Utilize the strategies listed above to achieve environmental and recreational success. The specific trail construction tactics utilized, need to be determined by each foot of trail, to overcome Adirondack obstacles such as; Boulders too big to move, Granite Ledge rock/Bedrock, Deep Root Mats and Duff, Big Trees/Big Roots, Black Organic Soils, Inaccessible Mineral Soil, Steep slopes with minimal soil, etc.

Classic bench cutting of trail tread as seen in VT, PA, CA or CO is limited to certain geologic/soils environments in the Adirondacks. Trail systems need to be sited where our environment and communities will support the construction of successful and sustainable trails. Not every environment or community is an appropriate place for the development of single track bike trails.

**3. Establish trail system design specifically for each site by evaluating the trail construction environment, community wishes and needs and the recreational experience desired.**

Referencing certain types of trail system design (stacked loops) should be avoided. These generic design types work in less extreme homogenous environments with soil. Instead state or list beneficial trail system design characteristics. This allows each specific location to be developed to its potential while keeping an emphasis on environmental and recreational standards.

**4. Someone must be responsible and accountable for the design and construction of the trail if it is going to be successful. They need to be knowledgeable and experienced in all aspects of trail construction and the recreation.**

This seems like a no-brainer but it is seldom the case. There is risk management, environmental and recreational experience issues that bear responsibility in trail construction. Generally, only one of these standards is met, depending on who is doing the project. DEC might meet the environmental or risk management standards and fail on the recreational experience. Volunteers classically do well on the recreational experience and fail on the risk management and environmental end. Someone needs to provide oversight for the project who will insure standards are met and be responsible for the overall success of the project.

I would like to go into a more detailed analysis of the information provided above but I have already given information that my business provides professionally to communities and private land owners and land managers. The experience, education and skills that Wilderness Property Management Inc. brings to this subject is unrivaled in northern New York and we are always willing to work with new clients to develop exceptional outdoor recreational experiences.

---

Steve Ovitt  
Chief Operating Officer  
Wilderness Property Management Inc.

3999 State Rt. 8  
Wevertown, NY 12886  
518 683-2005

RE: Mountain Bike Trail System Design and Construction Guidance document

RECEIVED  
ADIRONDACK PARK AGENCY

OCT 3 2017

Kathy,

I have reviewed the Draft Document and was pleased with the content and general emphasis. I am going to offer some specific information that I feel should be included and emphasized in the guidance document. This information is based on my professional trail construction experience in developing 4 Mountain Bike Park Trail Systems from concept/design and constructing over 25 miles of single track mtn. bike trail in the Adirondack Mountains over the last 5 years. These projects have utilized advanced techniques in sustainable trail design and cover the spectrum of mtn. bike trails from classic cross country hand build to freeride machine build.

1. **The most important aspect in all trail projects is the initial concept, design and layout. This is where all the policy and planning hits the ground and without the professional delivery of design and layout the planning energy was wasted.**

Increase the emphasis on Physical Design and Layout standards by having a stand-alone bold header section covering this subject. This is the most important step in making a trail sustainable, safe, fun, possible and successful. To do this successfully a designer needs knowledge of surveying/engineering, soils, hydrology, forest ecology, sustainable trail construction and riding experience. The proper design and layout prevents the need for lots of trail fixes or a failed project.

The specific items that need to be referenced in Design and Layout are: Grade established along trail corridor by Clinometer, Grade Reversals, Half-Rule (not mentioned and is very important to sustainable trail design), Geology/Soils over the entirety of the trail corridor, Vegetative Cover and density, Site factor determination of the type of turns that can be constructed, Type of trail construction (determines trail tread parameters), Risk/Speed management, Type of riding experience to be created and Targeted Skill Rating for a given trail.

Most of this information is already listed in the document in separate areas and in combination with other concepts/actions. Listing these things separately takes away from the importance of the design and layout action.

2. **Beware of trail comparisons between unlike environments and trail construction standards that were created in environments unlike the Adirondacks.**

Utilize the strategies listed above to achieve environmental and recreational success. The specific trail construction tactics utilized, need to be determined by each foot of trail, to overcome Adirondack obstacles such as; Boulders too big to move, Granite Ledge rock/Bedrock, Deep Root Mats and Duff, Big Trees/Big Roots, Black Organic Soils, Inaccessible Mineral Soil, Steep slopes with minimal soil, etc.

Classic bench cutting of trail tread as seen in VT, PA, CA or CO is limited to certain geologic/soils environments in the Adirondacks. Trail systems need to be sited where our environment and communities will support the construction of successful and sustainable trails. Not every environment or community is an appropriate place for the development of single track bike trails.

3. **Establish trail system design specifically for each site by evaluating the trail construction environment, community wishes and needs and the recreational experience desired.**

Referencing certain types of trail system design (stacked loops) should be avoided. These generic design types work in less extreme homogenous environments with soil. Instead state or list beneficial trail system design characteristics. This allows each specific location to be developed to its potential while keeping an emphasis on environmental and recreational standards.

4. **Someone must be responsible and accountable for the design and construction of the trail if it is going to be successful. They need to be knowledgeable and experienced in all aspects of trail construction and the recreation.**

This seems like a no-brainer but it is seldom the case. There is risk management, environmental and recreational experience issues that bear responsibility in trail construction. Generally, only one of these standards is met, depending on who is doing the project. DEC might meet the environmental or risk management standards and fail on the recreational experience. Volunteers classically do well on the recreational experience and fail on the risk management and environmental end. Someone needs to provide oversight for the project who will insure standards are met and be responsible for the overall success of the project.

I would like to go into a more detailed analysis of the information provided above but I have already given information that my business provides professionally to communities and private land owners and land managers. The experience, education and skills that Wilderness Property Management Inc. brings to this subject is unrivaled in northern New York and we are always willing to work with new clients to develop exceptional outdoor recreational experiences.



Steve Ovitt  
Chief Operating Officer  
Wilderness Property Management Inc.

3999 State Rt. 8  
Wevertown, NY 12886  
518 683-2005

[illegible][illegible]

Figure 1. The effect of the concentration of the inhibitor on the rate of polymerization of the monomer. The concentration of the monomer was 0.05 mol/L, the concentration of the initiator was 0.005 mol/L, and the temperature was 60 °C.

# THE

THE  
 NATIONAL  
 ARCHIVES





**From:** Sue Capone <adkbikeski@hotmail.com>  
**Sent:** Friday, September 29, 2017 11:35 AM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** bicycle trail guidance

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

To: Kathy Regan, Deputy Director for Planning

I support singletrack bicycle trails on Forest Preserve lands and expanding mountain bike opportunities. Bicycling is a healthy, quiet, nonpolluting activity that is an appropriate form of recreation. Certainly, good design, proper construction, and maintenance will ensure that trails are low-impact and sustainable. The Draft Management Guidance document will provide managers and trail builders with best practices for singletrack trails.

While it is true that mountain bikers prefer riding on singletrack trails designed specifically for biking, I would point out that many people also enjoy less technical riding. Cyclists are a diverse group with a range of abilities and preferences. Therefore, it is imperative that former roads and multiple use trails continue to be an important part of the Forest Preserve trail network. For example, sportsman often ride a bicycle to access more remote ponds or hunting grounds.

I propose that the reference to 2500 foot elevation be removed from the environmental condition on page 10. It gives the impression that trails above 2500 feet are not appropriate or allowed. With proper trail layout and design, trails should be allowed that do not adversely impact sensitive areas. Elevation should be irrelevant. There are no such arbitrary elevation restrictions for any other trail type in the Forest Preserve.

There are certainly many hills and ridges that rise above 2500 feet that could accommodate singletrack trails in the Adirondack Park.

I also strongly encourage the creation of long distance routes that connect trail networks and Hamlets. I agree that regional scale riding opportunities deserve special consideration.

Finally, I would like to make the point that good trail design that considers the needs of various users (hikers, skiers, bikers, etc) enhances the experience for all-season use. Simple forethought for water management, such as use of a rolling dip as opposed to a rock-lined water bar can make a huge difference in the enjoyment of riding the trail. Another example would be installing rider/skier friendly bridges for crossing streams or wet areas would be beneficial for environmental and safety reasons.

Paul Capone  
Vermontville, NY

**From:** theresa devlin <tdevlinzap@gmail.com>  
**Sent:** Sunday, September 03, 2017 3:36 PM  
**To:** SLMP\_Comments@apa.ny.gov  
**Subject:** Mountain bike trails

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Thanks for the opportunity to comment on SLMP bike trails.

I am a property owner and mountain biker (since 1987).

I have seen single track trails done well and not done well.

The best trails have the least excavation and interruption to the forest. Trails are built best by someone who understands the lay of the land and can visualize.

Please keep in mind all ability levels.

Too many expert trails in Wilmington. Attract more people.

Come and see the Gurney Lane trails in Queensbury.

Theresa Devlin