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November 13, 2003

Peter J. Frank
Bureau Chief Forest Preserve Management
NYSDEC
625 Broadway
Albany N.Y. 12233-4254

Re: Draft Revision of the Catskill Park State Land Master Plan

Dear Mr. Frank:

As Chair of the New York Mountain Bicycle Coalition (NYMBC), and the upstate New York Representative of the International Mountain Bicycling Association (IMBA), I respectfully submit these comments on the Draft Revision to the Catskill Park State Master Plan on behalf of these organizations. We appreciate the considerable amount of effort that you and your staff have put into development of this plan. We strongly support the recommendation in this draft revision to remove the provision that had automatically designated land above 2,700 feet as wilderness. This designation was arbitrary and did not allow NYSDEC to manage these lands in an appropriate manner. And as cyclists, we were concerned that this arbitrary designation could lead to equally arbitrary restrictions on bicyclists. Thus we support the repeal of this policy.

However, elsewhere the draft revision recommends new and far-reaching restrictions on bicycling that are unwarranted. We strongly urge that the draft revision plan be significantly modified prior to being issued as final. We are not opposed to the principle of regulation of bicycles in the park. Currently, there is no regulation of bicycles in the Catskill Park. We feel that overall bicycling opportunities and the experiences cycling provides would be improved with some regulation. However, the proposed measures are much too restrictive and are not justified. Our principle concerns are:

- The proposed implementation of a closed-unless-open policy on Wild Forests
- The proposed imposition of a blanket closure of all trails in wilderness areas to bicycles
- The proposed increase in the area of the park designated as wilderness
- The development and use of the concept of "bicycle trails"

These items are discussed in more depth below.

Wild Forests

The draft revision proposes to close all trails in wild forests to bicycles unless designated as open. This is a significant and drastic change in management of bicycles. However, this significant change in management approach is proposed with absolutely no justification provided in the plan. Based on our reading of the draft revision, we surmise that NYSDEC is familiar with the extensive documentation that bicyclists have no greater impact on bicycle trails than other human-powered trail users. Therefore, we are at a loss to understand why such significant restrictions are proposed to be applied to trails in Catskill wild forests. This unjustified proposed flip-flop in management policy needs to be removed from the plan.

Prohibiting use of bicycles on all trails unless designated open is contrary to the approach to bicycle management in Adirondack wild forests and in non-forest-preserve state forests across the state. This master plan revision should not introduce a new management approach contrary to the approach - which works - that is used throughout the rest of the state.

The draft revision should be modified prior to final release to allow bicycle use on all wild forest trails unless designated closed. Trails should only be designated closed where demonstrated sustainability concerns are present, such as in poor trail layout locations (e.g. excessive grade, poorly drained soils) or where trails are exceptionally crowded. Even in these situations, NYSDEC should propose to work with local cycling organizations to identify and/or develop alternatives to address these issues prior to closing the trails.

Wilderness Areas - Policy Issues and Size

The proposed ban of bicycles in designated wilderness areas apparently arises out of the stated goal of providing an “environment free of unnatural sights and sounds. Activities that involve the public’s use of motorized or mechanized vehicles or equipment will not be permitted” (page 25). We understand the demand from various segments of the population for NYSDEC to provide such situations. To a certain extent, NYSDEC needs to provide some such opportunities to meet this demand. However, we do not support the approach proposed in the draft revision.

While it is important for NYSDEC to recognize the desires of some park users to be able to meet their preference for a “mechanized-free” experience, it is equally important to recognize that where this goal is met, it simultaneously denies an equal or greater number of park visitors *their* preference for, and goal of, enjoying the park using a bicycle. Therefore, NYSDEC’s task is to balance these competing preferences of park users. By designating approximately half of the park as wilderness, we strongly suggest that NYSDEC has not adequately balanced these competing needs. Rather it is clear to us that the balance has been shifted much too far towards meeting the desires of the constituents looking for a “mechanized-free” experience than for those looking for the opportunity to responsibly enjoy the park on their bicycles. This is not right.

We recommend two changes to the draft revision to address this inequity. First, NYSDEC should remove the planned addition of over 50,000 acres to the wilderness areas. No new wilderness areas should be added to the system, nor should acreage of existing wilderness areas be increased. As stated above we applaud NYSDEC’s decision to remove the automatic designation of all land above 2,700 feet as wilderness. However, additional restrictions on the size of wilderness areas need to be implemented to responsibly balance the experience-based needs of those who enjoy Catskill Park. 50% of the park is too much to be designated as wilderness.

Second, NYSDEC should not categorically ban bicycles in wilderness. Even if the wilderness acreage is not increased in the final plan revision, the total wilderness acreage is still too great to balance the competing preferences of park users. NYSDEC should implement a careful review to designate some routes, including at least existing wilderness area *roads*, that would remain open to bicycles.

Designation of "Bicycle Trails"

The draft revision proposes to create a new trail designation known as "bicycle trails" (for example, see Table 3 on page 14). We oppose this new designation. Non-motorized trails in the forest preserve should be designated simply as "trails". "Trails" should be generally open to all human-powered users, unless there are well demonstrated reasons for limiting one or more user groups. Using the term "bicycle trail" implies that there are some unique requirements that need to be met for bicycles to be used. There are no such unique requirements. For example, sustainable trail design and maintenance guidelines issued by groups such as the Adirondack Mountain Club and the Finger Lakes Trail Conference are identical to those issued by the IMBA Trail Care Crew program.

We therefore request that the concept of "bicycle trails" be removed from the draft revision. Trails sections where bicycle use are inappropriate are in most cases not sustainable for any use, including hiking, and should be removed or rerouted. If NYSDEC wishes to keep unsustainable trails open due to unique conditions (e.g. highly eroded fall line trails servicing hilltops, where reroutes are difficult to implement), then trails could be signed closed to bicycles. But separate designations of "hiking" and "bicycle" trails should not be made.

The one exception to this general recommendation would be where NYSDEC and local cycling groups may decide to work together to develop special highly technical and challenging riding areas. Intensive use areas and some sections of wild forests would be appropriate sites for authorized sections of trails designed to provide challenge specifically to cyclists. These trails would not appeal to the typical hiker, and may not be hikable at all. In these special cases (only), it would be appropriate to apply the designation of "bicycle trail".

Summary

Cyclists in New York were quite taken aback when the drastic restrictions in cycling were proposed in the draft revision to the Catskill Park Master Plan. The proposed changes are much too significant and are not justified. Such drastic measures are not needed to successfully manage bicycles in Catskill Park. We support management of bicycles, and believe that this form of recreation would benefit compared to the guidelines being silent on bicycling. I would submit that there is more common ground among park advocates than the planners who proposed the significant restrictions may realize. In the forest preserve (in contrast to most state forests), there are many fall line "peak-bagging" trails, built long before concepts of sustainable trail design were developed or regularly applied. Problems with erosion on these trails (due more to trail design than bicycle use) or with negative interactions between hikers and descending cyclists are unique to such trails. These trails need to be looked at on a case-by-case basis. But issues on these types of trails should not be basis for applying widespread restrictions on the use of bicycles in the park.

A list of page/section-specific comments is on the draft revision is attached as an appendix. Thank you for the opportunity to comment on this draft plan. If you wish to contact me to discuss these issues, you may use the address on the letterhead, or e-mail me at jsundqui@buffnet.net

Sincerely yours,

Jon Sundquist
State Representative, IMBA
Chair, NYMBC

cc: Robert Davies
Peter Duncan
William Rudge

Specific Comments on “Draft Revision, Catskill State Land Master Plan, August, 2003”

1. **Page 13, fourth bullet.** This guideline says “if possible, different types of trail use will be separated”. We strongly disagree with this concept. Separation of use discourages cooperation (and some say breeds contempt) among various trail user groups, which is not good. Designating specific areas for, say, bicycling also encourages the development of poor trail etiquette. The vast majority of the trails available to cyclists in the state are shared use, requiring cyclists to yield to hikers and equestrians. NYSDEC should not promote trails where such courtesy is not required. An additional problem with this approach is that it would likely be very difficult to persuade hikers who currently use some trails to give up their use in order to create “separate use” areas. And in fact, there is no mention in the draft revision about mechanisms to limit hiker use of certain trails. For these reasons, the “separation of uses” concept should be removed from the “guidelines” section, at least for non-winter trail uses.
2. **Page 14, Table 3.** The concept of “bicycle trail” should be removed from the draft revision. Please refer to the main text of this letter for further discussion.
3. **Page 28.** Sections on this page should be revised to remove the categorical exclusion of bicycles from Wilderness. Provision should be allowed for opening of individual trails as appropriate.
4. **Page 35, “Bicycles in Wild Forest”.** This section should be revised to indicate that all trails in Wild Forest be open to bicycles unless designated closed due to unmitigable sustainability issues or unique circumstances such as high-popularity crowded trails.
5. **Page 35-36, “Bicycle Trails in Wild Forest”.** Please refer to Comment #2 and the main letter text for discussion on “bicycle trails”. The first bullet of this section describes in detail hardened surface design, but only touches briefly on natural surface trail construction. Well designed trails suitable for bicycles are almost entirely natural surface.
6. **Page 62, Action item #2.** This action item should be removed from the list of items necessary to implement the CPSLMP. Bicycles should not be limited to trails designated and marked for their use. Some trails may be closed to bicycles, and should be so marked. Promulgated regulations are not needed, however, for such closures.
7. **Pages 74, “Major changes proposed” section.** Item no. 4, indicating that bicycles be limited to designated trails only, should be removed from the list of proposed changes.
8. **Pages 75, Items 1 and 2.** These items refer to the propose new designation of Windham Blackhead Range Wilderness and Expansion of the West Kill Wilderness. Addition of this additional wilderness acreage increases wilderness areas to over 50% of the park, providing unbalanced accommodation among groups wishing to enjoy the park. These two items should be removed, and no additional wilderness acreage be designated.
9. **Pages 76, Item 4.** This item should be removed from the list. Bicycles should not be restricted to designated trails only. Trails should be open to bicycles unless closed. Wilderness trails should not be categorically closed to bicycles.