

Appendix A

Individual Comments on the Draft Recreation Plan

This section provides individual stand-alone comments on various aspects of the draft plan. Placing these comments in an Appendix is not meant to mean these comments are secondary. Rather, the main text of this comment package is focused on the principle issues of concern to NYMBC and IMBA. Addressing each and every item in the main text would make it harder to read and follow. These comments comprise the comprehensive list of changes and clarifications needed for the final draft plan. Please note that there is much in this plan that NYMBC and IMBA agree with. These comments specifically address what we do not agree with, but should not imply that this represents a repudiation of the plan as a whole. These comments are listed in an order corresponding to where the subject text appears in the draft plan. Page numbers refer to the printed page numbers that are located at the foot of each page of the downloadable Adobe Acrobat version of the draft plan.

- 1) **Page 14, paragraph 3.** This sentence indicates that a TRP is required to construct trails. Elsewhere in the state, trails may be constructed under an adopt-a-resource agreement. Furthermore, liability insurance is not required. If this is meant to be a recommendation for a change in volunteer policy, this should be clarified. If this is not a recommended change in policy, then the text should be revised to indicate that a TRP is not required for trail construction. Of course, any new trail routes must receive prior approval from DEC.
- 2) **Page 16, Item 3.** This item contradicts the text addressed by Comment (1). Specifically, this section indicates that an adopt-a-resource agreement *is* suitable for new trail construction.
- 3) **Page 23, paragraph 2.** This paragraph is the only place in the draft plan that states clearly the overriding theme of Region 7's recommendations, namely that the draft "plan proposes to restrict activities, other than pedestrian activities, to designated trails only." The draft plan makes this distinction because "Almost without exception, these activities are carried out under one's own power, without the aid of machines, motors, or animals." The distinction between human power and nonhuman power (motors or animals) is important. The distinction between human power and nonhuman power correlates well to the level of impact to natural resources. The draft plan itself states (p. 11) its aim is to determine "what is best to protect the natural resources while

providing opportunities for public recreation and use." This implies that the draft plan should provide suitable opportunities for recreation within the constraints of protecting the resource. The draft plan should thus strive to accommodate human-powered recreation. Ignoring this, though, the draft plan lumps, in an overarching manner, bicycles into the category of "machines, motors, or animals" rather than regulating based on impact, i.e. human-powered vs. non-human-powered. This is a central weakness of this draft plan. The final plan should not include bicycles with motorized or animal-based recreational users. The final plan should drop the term "machine" from the list of criteria used to categorize trail users because it is not meaningful within the context of trail impact.

These comments do not override NYMBC's support for trailless state forests. Bicycles will inherently be disallowed from trailless forests because bicycles do not work off trail in densely forested areas as are found in Region 7. We would support in the final plan explicit requirements that bicycles are to remain on trails.

- 4) **Page 35, Item 3.** This section recommends closing all roads to bicycles unless designated open. Roads should be open to bicycles. While we can envision some reasons why some trails should be closed to bicycles based on sustainability considerations, or as a compromise situation to accommodate hikers who object to bicycles for personal reasons, there can be no conceivable reason for closing roads to bicycles.
- 5) **Page 42, paragraph 3.** This paragraph states "These two activities [Horseback riding and mountain bike riding] also require wider trails and have more environmental impact on the foot trails than pedestrians do." This is not true. The accepted standards for constructing mountain bicycle trails are identical to those for hiking trails. This sentence also is an example of the draft plan's linking bicycling with non-human-powered recreation, which is inappropriate. No documentation is provided to support that bicycles "have more environmental impact on the foot trails than pedestrians do." This paragraph should be revised to remove references to bicycles.
- 6) **Page 42, recommendation 4.** NYMBC and IMBA are not opposing limitation of long-distance linear foot trails to hiking-only *in Region 7*. There are two reasons why we are not opposing this restriction. One is in an effort to compromise with pedestrian users who dislike seeing bicycles

on the trail. We generally believe that use of the trail should be regulated based on impact to natural resources, rather than user preferences. While we compromise in this situation, we urge Region 7 to not overlook the similar impacts on, and hard feelings of, users who dislike seeing "Trail closed to bicycles" signs at the trailhead, who are arguably even more inconvenienced. Secondly, these long distance trails are contiguous with segments on private lands whose owners may have given permission for hiking use only. To prevent bicycles from inadvertently straying onto private property, we support designating these trails as hiker only.

This agreement does not imply agreement that this arrangement should be applied statewide. Elsewhere in the state, long distance linear trails, including the Finger Lakes Trail, are open to bicycles on state forest lands; in some cases, they are primarily maintained by bicycle organizations. Many of these sections are not contiguous with private land segments; the state forest sections start and end at paved road sections of the trail. Bicycles should continue to have access to these sections. The Finger Lakes Trail is a component of the North Country Trail. Bicycles are allowed on many public-land sections of the North Country Trail across the country, especially in Ohio and Michigan.

- 7) **Page 44, paragraph 6.** The paragraph relates to a potential new long-distance hiking trail in Labrador Hollow Unique area, including prohibiting bicycles in this area. As stated in Comment (6), we are not opposing this. However, this paragraph once again lumps bicycles with motorized and equestrian uses, saying "Mountain bikes, snowmobiles and horses will not be permitted to use the trail because of maintenance and environmental concerns." This generalization is not correct. The sentence should be revised to indicate "Snowmobiles and horses will not be permitted to use the trail because of maintenance and environmental concerns. Furthermore, bicycles will also be prohibited because the trail will be designated a long-distance hiking trail and will be located, in part, on a state unique area."
- 8) **Page 47, Technical Specifications.** The recommended tread width for hiking trails conflicts with the specifications provided by the National Park Service for the North Country Trail. The NPS recommends a tread width of two feet.

- 9) **Page 55, paragraphs 6 - 8.** The three descriptions of bicyclists fail to describe perhaps 80% to 90% of cyclists in state forests. Most cyclists look for more than just "relatively gentle ground", and thus are excluded from the first description. Very few would consider "enjoyment of the surroundings to be secondary", and thus are excluded from the second category. The third category describes "Extreme riders" who "do not depend on trails". Except in rare instances, the terrain of Region 7 forests does not allow bicycles to work off-trail (even if it were allowed), and thus few if any would fall into this category. The failure of the draft plan to adequately describe cyclists, the one user group who would be the most restricted by the recommendations of this draft plan compared to the current management, suggests that the recommended changes in management are not based on an adequate understanding of the activity, its practitioners, or its impacts. The typical cyclist is very similar to the typical cross country skier. Both these human-powered, low-impact sports provide for enjoyment of the woods, while adding the fun of gliding along. Cycling provides the most intimate relation between the user and the trail. The best analogy to describe cycling on a trail is as a dance, with the trail as your partner. Rather than simply plodding along a trail, the cyclist is involved in a seamless fluid relationship with trail, that many liken to a spiritual experience.
- 10) **Page 56, Current Opportunities.** The listing of current opportunities significantly under represents the actual current opportunities. All trails are currently open to bicycles, unless designated closed. There are far more opportunities for cycling than presented in this section. Please note that these opportunities are not illegal cyclist-built trails. Some illegal trails are reported to exist. But most trails currently available to cyclists have been available since before cycling became more popular in the 1990s.
- 11) **Page 56-57, Environmental Impacts, Constraints, and User Conflicts.** Section 3 of the main text is incorporated into this appendix by reference. Section 3 describes in detail our comments on this section.
- 12) **Page 58, paragraph 1.** The draft plan states "Mountain biking can severely degrade the environment if trails are not properly located." Comment (11) inherently addresses this as well. But in summary, this statement applies equally to other human-powered activities, including hiking. Yet this statement is used to justify the statement later in this paragraph "Due to

environmental concerns and conflicts with other users of the state forests, mountain biking is acceptable only on designated trails." The plan pointedly does not limit hiking to just designated trails. Based on similar impact between these uses of the trails, there is no basis for banning bicycles from all but designated trails.

- 13) **Page 58-59, Actions 1, 2, and 5.** Section 4 of the main text is incorporated into this appendix by reference. Section 4 describes in detail our comments on banning bicycles on all but designated trails, and on the excessive duration of the recommended wet season closure period.
- 14) **Page 108, Table.** Culverts or bridges should not be required for all stream crossings on trails where bicycles are not prohibited. First, this table entry does not define what is meant by stream crossing, and could be interpreted to imply any seasonal drainage would be sufficient to close a trail to bicycle use until improvements are made. Many "streams" are dry most of the year. Secondly, natural or hand-assembled rock fords are suitable measures for crossing most streams. These are in fact preferred to culverts. If a culvert blows out following a large storm, there is a huge sediment load delivered to the stream. Also, water generally flows too fast through a culvert. Rock fords are the best approach for stream crossings. Bridges should only be required as described in the hiking trails requirements, namely, "stream width greater than 10' and average water depth is at least 6" or if bank height is greater than 30"."

Empirical evidence collected at the Tahuya State Forest in Washington State where trails cross salmon-breeding streams indicates that the angle of approach of a trail is the most important factor in sedimentation impacts, at least for that place. The study process included installation of various trail hardening techniques and water diversion structures on the stream crossing approaches. These techniques and structures did reduce sedimentation. However, rerouting of approaches to lessen the angle of approach, preferably to less than 10 percent, was determined to be the most effective measure.

- 15) **Page 110, paragraph 1.** This paragraph states "ATV use, horseback riding, camping, mountain biking and snowmobiling are high impact activities that conflict with the environmental interests of these lands." Here, the draft plan again inappropriately lumps cycling in with a range of non-pedestrian activities. Bicycling is *not* a "high impact" activity. Bicycling should be removed

from this list.

Note, NYMBC and IMBA are not recommending that bicycle access be provided in unique areas. We accept this compromise since these areas are, by definition, unique. The total acreage of unique areas within Region 7 is not great, and eliminating these from possible bicycle use would not significantly limit overall bicycling opportunities.

- 16) **Pages 113-114.** Section XII in these pages recommends that the recommendations of the draft plan be adopted as state-wide regulations through revision of the Environmental Conservation Handbook and 6NYCRR. First, while there are many aspects of the draft plan to which we agree, the two most important issues that we see needing revision before this plan goes final (reversing the bicycle management approach to closed-unless-open, and the six-month closure of all trails) are the only two bicycle-related elements that the draft plan recommends to be codified in statewide regulations. We urge these to be removed from the final Region 7 plan. So likewise we object to them being applied elsewhere in the state. Secondly, it is wrong to apply recommendations developed in one regional office, based on input and comment from one region only, to regulations that apply state wide. The entire Section XII should be removed from the final plan.
- 17) **Page 191, Table.** There is no backup for setting the minimum acreage for mountain bicycle use to be 1000 acres. Adequate trails can exist on forests smaller than 1000 acres.
- 18) **Pages 203ff (Appendix 6).** NYMBC and IMBA are not commenting on this appendix because we strongly urge that bicycle management policy should not be changed, but remain open unless closed. It is therefore not necessary to comment on specific sections of trail should be open to bicycles in this Appendix. It is noted, however, that the “existing” table under represents the amount of trails currently open to bicycles.
- 19) **Page 243, paragraph 4.** This paragraph states “Bikes and snowmobiles will be confined to trails. This should lessen impact that these activities have on the rest of the state forests.” This sentence is misleading on two accounts. First, it again lumps bicycles together with motorized vehicles, creating the impression that impacts from bicycles are similar to impacts from

motorized users. Secondly, of all state forest users, cyclists are the least likely to stray off trail. It is not clear why, in this section on hunting, bicycles are mentioned as a reason why trails increase and hunting opportunities are lost. Mention of bicycles should be removed from this paragraph.