



October 29, 2010

Robert Messenger
Justin Perry
New York State Department of Environmental Conservation
Division of Lands and Forests
625 Broadway
Albany, NY 12233-4255

Re: Draft Strategic Plan for State Forest Management

Dear Mr. Messenger and Mr. Perry:

As trails chairman of WNYMBA, and the New York State Representative of the International Mountain Bicycling Association, I am writing in support of the draft Strategic Plan for State Forest Management. Overall, WNYMBA and IMBA are pleased with the draft plan, however we have some comments for minor revisions to address mountain bicycling more accurately.

Conflicting Language, Trails Open Unless Posted Closed

In the section on cycling, starting on page 204, the plan reiterates the recent part 190 regulations that promulgate that all state forest trails are designated open unless closed. This regulation is captured in the text on page 204 that says "Mountain bikes are permitted to travel on any existing road or trail on State Forests unless the road or trail is posted as closed for this use."

However, later in this same section, the draft plan says "Due to environmental concerns and conflicts with other users of the state forests, mountain biking is acceptable only on trails that have been assessed and approved for such use." This sentence appears to be in direct contrast to the statements in the opening sentence of this section and in opposition to the recent part 190 regulations. I have discussed this with you in person and you indicated that that was not the intention. However, a casual reader of the draft plan could easily interpret this sentence as an argument that bicycles do not belong on a particular trail if it has not yet been specifically assessed. Realistically, especially considering the staff cut backs at NYSDEC, it is not reasonable to assume that every trail in the state forest system will be getting such an assessment any time in the near future. Besides, the specific intent of the recent part 190 regulations was that trails would be open to bicycles by default. We agree that some trails may be closed if an assessment shows their design is unsustainable and they receive sufficient use to be impacted. However, such an assessment would be used to designate trails as closed, not as open. The above-referenced sentence on page 205 should be removed. The rest of the points made in this paragraph would remain valid even after this sentence is removed.

Long Distance Foot Trails Exceptions

This draft plan states for the first time an opinion by NYSDEC that long distance foot trails be designated as hiking only. The Finger Lakes Trail (FLT) is specifically mentioned as an example. WNYMBA and IMBA

have long and vigorously objected to such designations, specifically pointing out that the National Scenic Trails Act (which applies to the North Country Trail, of which the FLT constitutes one portion), specifically states ““potential trail uses allowed on designated components of the national trails system may include, but are not limited to, the following: **bicycling**, cross-country skiing, day hiking, equestrian activities, jogging or similar fitness activities, **trail biking**, overnight and long-distance backpacking, snowmobiling, and surface water and underwater activities.” (emphasis added).

WNYMBA understands that NYSDEC has been under considerable lobbying pressure from hiking organization to institute the hiking-only policy on the FLT. While we object to this designation, we were heartened to see that the draft plan included some exceptions.

One of these exceptions (page 202) is “Where the FLT passes through a State Forest which is also dedicated to an extensive system of trails, accommodating other recreational uses, and it is not feasible or avoidable to have some trail overlaps.” This exception perfectly describes the situation in Cattaraugus 5/8 (McCarty Hill/Rock City).

Just as the draft plan specifically mentions the FLT as a good example of a “long distance foot trail” the draft plan should include a statement indicating that the FLT in Cattaraugus 5/8 is a good example of “an extensive system of trails, accommodating other recreational uses, and it is not feasible or avoidable to have some trail overlaps”. There is no better example of where such an exception would apply.

It should be noted that the FLT does not enter or leave Cattaraugus 5/8 through private property closed to bicycles. In the north, it leaves state forest property through a ski area that is open to cycling (and leaves the ski area only after crossing a major highway), and to the south, enters the state forest along a public right of way (a town road). Thus, this section of the state forest is especially suited for this exception, since use of the FLT on state forest property does not lead to sections of the FLT on private property which are closed to bicycles.

Trail Impacts

The paragraph that starts on page 204 and ends on page 205 discusses impacts of bicycle use of trails. However, there is no similar discussion on impacts on hiking use of trails except for the single sentence on page 200 stating “Environmental impacts of hiking include trail compaction and erosion from poor trail design or overuse”. This implies a bias against trail use by cyclists. Study after study has shown that impacts from bicycles are equivalent to hiking. The casual reader of this draft plan would come away with the impression that impacts from cycling are much greater than hiking.

To prevent this misperception, the draft plan should be revised to include language in the hiking section similar to the language in the cycling section. Specifically, discussion of impacts such as “widening of trails to avoid obstacles”, “trail braiding to avoid obstacles”, “need for constant maintenance to control erosion on unsuitable soils”, “Trees cut or damaged when trails are established by users without authorization”, “erosion of stream banks where the trail crosses a stream” are some of the impacts that apply to hiking and other trail uses, and are not specific to bicycle use.

XC Skiing Conflict (Lack Thereof)

Page 205 states that cycling can be a conflict with XC skiing. This is no such conflict. As a former member of the US Ski Orienteering team, I have done plenty of skiing and can attest that when there is enough snow on the ground for good skiing, there is too much snow on the ground for cycling. Conversely, when the snow is shallow enough to allow bicycling, there is not enough snow to allow cycling.

The only exception to this is if there are prepared compacted trails on state forest land designated for skiing. The only places I am aware of this happening is at Hammond Hill State Forest and Winona State Forest in Region 7. So in general, this conflict does not apply to state forest trails. The sentence should be revised to indicate that the conflict applies only to trails groomed/packed or otherwise prepared specifically for skiing.

Trail Guidelines

NYSDEC has already indicated that the requirement on page 165 that trails open to cycling should be below 2000 feet of elevation is a mistake and will be removed. Overall, the plan's description of how to design and build trails suitable for bicycles is good. In fact, many of these criteria are directly applicable to all kinds of trails, especially trails that are suitable for hiking, and we suggest that many of these components be added into the trails suitable for hiking.

"Bike Trail" Terminology

On page 204, there is a reference to "designated mountain bike trails". Similarly, the caption to the photo on page 165 is "Golden Hill Bike Trail". Since the new part 190 regulations allow bike use on virtually all of state forest trails (except those few designated closed), there is no such thing as a "bike trail" or "designated bike trail" in the state forest system. Use of this term may lead the casual reader of the plan to think that only certain trails that may have the designation "bike trail" are open to bicycles. To avoid this confusion, we recommend that the use of the term "bike trail" be avoided.

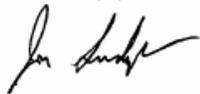
Summary

Thank you again for your hard work in preparing this plan. Overall, we believe this is a good solid plan, with only a few areas requiring revision to better reflect mountain bicycle use of state forest trails. In summary, our comments and requested revisions are:

- Remove language on page 205 suggesting trails need to be assessed before being opened to bicycles,
- Consider removing the hiking-only preference for the FLT,
- If the hiking-only preference remains for the FLT, the plan should specifically mention Cattaraugus 5/8 as an example of the listed exception to hiking-only where "an extensive system of trails, accommodating other recreational uses, and it is not feasible or avoidable to have some trail overlaps",
- Harmonize the trail impacts discussion among various users so the casual reader does not get the incorrect impression that bicycles have greater impacts than, say, hiking.
- Revise the mention of conflicts with XC skiing to indicate these only apply to groomed/prepared ski trails.
- Remove language limiting bicycle trails to below 2000 feet elevation
- Refrain from the use of the terms "bike trail" and "designated bike trail".

Please contact me during the day at 716-923-1207 or by e-mail at JAS@TrailMap.us if you wish to discuss these issues further.

Sincerely yours,



Jon Sundquist

WNYMBA Trails Chair
IMBA Upstate New York Representative