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Chairman

TERRY MARTINO
Executive Director

MEMORANDUM

TO: Terry Martino, APA
Kathy Moser, DEC

FROM: Kathy Regan, APA
Karyn Richards, DEC

DATE: February 26, 2018

RE: Response to Public Comments for “Management Guidance: Siting, Construction and Maintenance of Singletrack Bicycle Trails on Forest Preserve Lands in the Adirondack Park”

In August 2017 Department and Agency staff presented the Agency Board with a draft guidance document entitled “Management Guidance: Siting, Construction and Maintenance of Singletrack Bicycle Trails on Forest Preserve Lands in the Adirondack Park” and requested authorization to proceed to public comment. The public comment period began on August 11, 2017 and ended on September 29, 2017.

Staff received 31 comments on the draft guidance, which are summarized below. Where warranted, a response from Department and Agency staff is included in italics..

Changes made to the document in response to public comment and/or based on further staff review include: (1) greater detail in the trail alignment section; (2) a new section describing best practices for bridge design on bike trails; (3) an overview of soil characteristics and their relationship with trail design; (4) guidance regarding directional bike trails; (5) tips for using professional trail design consultants; and (6) Guidelines for the Administrative Use of Motor Vehicles to Build and Maintain Bicycle Trails.

Summary and Response to Public Comments

General Support

Comment: Support the proposed trail building guidelines.

Response: *Department and Agency staff appreciate the public support for this guidance and all of the constructive feedback we have received from individuals, businesses, and advocacy organizations.*

Multiple Use Concerns

Comment: Multiple use trails are not attractive or functional for other recreational pursuits (e.g. hiking, horseback riding or cross country skiers).

Response:

The primary purpose of this document is to provide guidance for the development of singletrack bicycle trails and biking opportunities. This guidance does not resolve every issue that may occur when trails are shared. Department and Agency staff recognize that certain trails are not appropriate for certain kinds of shared use due to excessive user conflicts, unsuitable/unsustainable trail conditions, or other reasons. However, certain bike trails are managed for multiple uses successfully. Guidance for the design and management of each of the different kinds of trails (in this case bicycle trails) included in the Adirondack Park State Land Master Plan (APSLMP) provides assistance for the management of shared use trails. Identifying a trail as a shared use or multiple use trail is a reflection on a management strategy and not necessarily a specific design. The specific design of the trail is determined by the trail's designed use as set forth in guidance documents such as this one.

Comment: Trails constructed for mountain biking are not conducive for use by other forms of recreation (e.g. equestrian, hiker, skier).

Response: *Trails primarily designed, constructed and maintained for mountain biking are available, and are frequently used, by a variety of other users (e.g. trail runners, dog walkers, hikers, snowshoers, skiers, and birders). The Department will continue to monitor concerns of users. In addition, the Department will continue to construct and maintain trails not open to bicycles in Wild Forest areas.*

Comment: The guidance should only refer to trails that are defined in the APSLMP. A "Multiple Use Trail" is not defined in the APSLMP.

Response: *For the purpose of this guidance, the term "shared use" is used to recognize when a trail can be used by more than one user group. Any trail defined in the APSLMP (e.g. cross country ski trail, horse trail, foot trail) may be used by more than one user group unless restricted by the Department. "Shared Use" does not necessarily mean that a trail is specifically designed for each allowable use, but rather that the trail may serve a multiple use function.*

Comment: When new opportunities for mountain biking are created, new opportunities for passive recreation should be also be created.

Response: *Opportunities for recreational access via conforming recreational programs (passive, active, educational, extractive, etc.) in the Adirondack Forest Preserve will be planned according to the provisions of the APSLMP and all other applicable laws and regulations. Opportunities for passive recreation will continue to be available on lands throughout the Forest Preserve.*

Doubletrack and Former Woods Roads Concerns

Comment: The use of the term “former woods roads” in the guidance is not defined in the document or the APSLMP. The guidance should not use this term as it is not a use or activity authorized in the APSLMP.

Response: *The reference is intended only to characterize the historic, limited use of these roads in the Forest Preserve prior to the acquisition of the lands on which they are located, not to provide a new, undefined term.*

Comment: Delete the Doubletrack section. This guidance is for singletrack trails.

Response: *References to doubletrack and former woods roads provide important context when planning for singletrack bike trails since they are a part of the landscape of the Forest Preserve.*

Comment: Singletrack trails are only suitable for advanced riders. The guidance should state that former woods roads are an important opportunity for novice riders.

Response: *Singletrack trails can be designed for all abilities of mountain bikers. The Singletrack Trail Rating System in this guidance describes the characteristics of Singletrack trails from “Easiest” to “Extremely Difficult.” Former woods roads can be, and are often, repurposed as trails. A former woods road that is repurposed as a singletrack bike trail and managed in accordance with this guidance will be less road-like in character and more conducive to the kind of riding experience that mountain bikers are seeking.*

Comment: *Mountain bikers prefer a mixture of trail types, rather than single track trails specifically for mountain biking.*

Response: *This guidance does not aim to restrict the wide range of experiences of mountain bikers (e.g. easy dirt roads to rocky/technical trails) open to mountain bikes. As part of recreation planning on the Forest Preserve, a variety of opportunities may be provided (within the bounds of the NYS Constitution, the APSLMP, the Environmental Conservation Law and Department regulations) for mountain bikers. The variety provides opportunities to recreate, and prevents the development of unauthorized trails*

and conflicts with other users. The focus of this guidance is to provide land managers with the tools to construct and manage single track mountain bike trails. Research shows the majority of mountain bikers prefer single-track trails¹.

Motor Vehicle Use

Comment: The appropriate use of motor vehicles needs clarification as it relates to trail construction and maintenance on bike trails. Only hand tools should be used for construction and maintenance of bike trails.

Response: Pursuant to the APSLMP, the Department has the ability to build and maintain conforming structures and improvements in most land classifications using motor vehicles. This guidance clarifies certain elements of the APSLMP, but it does not change or amend it. Part VI of the guidance has been added to clarify how the Department may use motor vehicles on bike trails.

Professional Trail Design

Comment: Professional trail design is a critically important to creating a riding opportunity that will be appealing to mountain bikers. The necessity of incorporating professional design of bike trails should be emphasized in the guidance.

Response: Section IV of the guidance has been modified to reference professional trail design assistance.

Constitutional Concerns

Comment: Concentrated bike trail networks, such as stacked loop networks found in the Wilmington Wild Forest, are considered highly developed facilities requiring an amendment to the constitution.

Response: According to the APSLMP, Wild Forest lands are where **“The resources permit a somewhat higher degree of human use than in Wilderness, Primitive or Canoe Areas, while retaining an essentially wild character. A Wild Forest area is further defined as an area that frequently lacks the sense of remoteness of Wilderness, Primitive or Canoe areas and that permits a variety of outdoor recreation.”** While the APSLMP is constitutionally neutral regarding appropriateness or

¹ Koemle, D. B., & Morawetz, U. B. (2016). Improving Mountain Bike Trails in Austria: An assessment of Trail Preferences and Benefits from Trail Features Using Choice Experiments. *Journal of Outdoor Recreation and Tourism*, 15, 55-65. Retrieved November 3, 2017, from <https://www.journals.elsevier.com/journal-of-outdoor-recreation-and-tourism/>.

Morey, E. R., Buchanan, T., & Waldman, D. M. (2002). Estimating the benefits and costs to mountain bikers of changes in trail characteristics, access fees, and site closures: choice experiments and benefits transfer. *Journal of Environmental Management*, 64, 411-422. doi:10.1006/jema.2001.0513

inappropriateness of any structure, improvement or use of Forest Preserve lands, it directs where higher levels of use and the kinds of recreational use that are appropriate. Mountain biking is a conforming recreational use in Wild Forest areas. The guidance includes multiple criteria to consider before planning a stacked loop riding opportunity (Environmental, Local Support, Location, Trail Density). Taken together, these criteria serve to direct new trail development in a way that protects resources, preserves wild forest character, and provides a riding experience that is valuable to mountain bikers.

APSLMP References and Modifications

Comment: Modify the second paragraph in the Statement of Purpose to more accurately reflect APSLMP language.

Response: *Modifications have been made to this paragraph.*

Comment: Cite the “unifying theme” language from the APSLMP in the Purpose Statement of section I. Cite other applicable laws and Article 14.

Response: *The guidance minimizes the use of legal language. This does not diminish the effect of any laws.*

Comment: The riding opportunity described as a “Long Distance Tour” will require a change in the APSLMP.

Response: Long Distance Routes (formerly described as a Long Distance Tour) can be planned and developed without making modifications to the APSLMP. The Adirondack Trail Ride is an example of a Long Distance Route utilizing existing roads and trails on public and private lands within the Park. Changes to the APSLMP are outside of the scope of this guidance, but the comment is noted.

Trail Design Concerns

Comment: Provide more detail in the Trail Alignment section.

Response: *More detail regarding trail alignment is provided in Section IV.*

Comment: Limit how often side slope management and insloped corners can be used.

Response: *Placing limitations on how often side slope management can be used on bike trails encourages the creation of fall-line trail alignments. Fall-line trail alignments are prone to erosion and widening due to poor tread definition and trail braiding. Limiting side slope management also creates tread conditions that are particularly prone to tread creep. In addition to the soil resource impacts associated with limiting side slope management, the trail users experience is negatively impacted by a poorly defined trail that is reliant upon heavy usage to establish a tread surface through*

compaction alone. Relying solely upon the impacts from trail users to establish a tread surface creates drainage problems in addition to the tread creep and braiding issues noted above. All of these problems are commonplace in the Adirondacks where trails have been in existence for many years. Correcting these problems is accomplished by re-routing the trail in such a way that the new alignment provides suitable environmental conditions for side slope management to take place (soils, cross-slopes, hydrology). The guidance doesn't limit how often side slope management can occur, but it does seek to minimize the intensity of it (and thus its impact on Wild Forest character) by directing new bike trail development to locations where the terrain is naturally conducive to trail construction and soils are able to support the side slope management that will occur during the trail construction process. Just as side slope management is minimized, the construction of insloped corners is similarly minimized by directing the construction of insloped corners to locations that are naturally conducive to it without requiring the construction of large obtrusive berms. Insloped corners serve to control the kinetic energy of bikers travelling along the trail in a way that improves the riding experience and reduces the impacts caused by tires skidding to navigate flat or out sloping corners. When side slope management and insloped corners are implemented correctly on bike trails, the tread remains narrow and the soils that constitute the tread surface are stabilized.

Comment: Include management prescriptions to stop and prevent tread creep.

Response: *Please see the response to the prior comment.*

Comment: More details relating to the design and siting of bridges on bike trails should be included in the guidance.

Response: *Changes have been made to reflect this comment in Section IV. Part K. of the guidance.*

Trail Maintenance Concerns

Comment: Establish clearing standards for the removal of organic debris as a maintenance activity to the maximum 36" tread width.

Response: *Changes have been made to reflect this comment in Section V.*

Carrying Capacity Concerns

Comment: 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.

Response: *Pursuant to the APSLMP, carrying capacity is addressed within the individual UMPs. The Department and the Agency are continually exploring the best*

available methodology for evaluating carrying capacity as it relates to resource protection, wildland values, and the visitor use experience. The development of this guidance is an important step towards assuring that bike trails and bicycle use in the Forest Preserve is directed to the areas with the right conditions to support it.

Uncategorized Comments and Concerns

Comment: Add more definitions to cover terms used in the document.

Response: *Several terms used have been removed. The words included in the Definitions section are sufficient to understand the meaning of the document.*

Comment: Use a decision making framework similar to the Minimum Requirements Approach(MRA) for Construction of Trail Bridges.

Response: *A Minimum Requirements decision making framework is not necessary for this guidance. This guidance can be used in conjunction with the recently developed Minimum Requirements Approach Guide for the Construction of Trail Bridges in Wild Forest Areas in the Adirondack Park as needed.*

Comment: Add language from the August 2017 APA board presentation to the Statement of Purpose..." section.

Response: *The Statement of Purpose touches on all of the themes identified in the APA board presentation. There is no need to rephrase this section.*