



January 31, 2019

Kevin Prickett  
NYS Adirondack Park Agency  
P.O. Box 99  
Ray Brook, NY 12977

**RE: Draft Management Guidance for Cross Country Ski Trail Design,  
Construction and Maintenance on Forest Preserve Lands in the  
Adirondack Park**

Dear Kevin:

*Adirondack Wild: Friends of the Forest Preserve* submits these comments for consideration by the APA as the agency moves to complete the Final Cross Country Ski Trail Guidance. Adirondack Wild has gladly participated in many meetings with DEC and APA on this topic over the past several years, and we appreciate the considerable amount of staff effort expended by both agencies to reach this point.

In general, Adirondack Wild is supportive of the purpose-built cross country ski trails recommended in this Guidance document. However, some of the trail dimensions recommended in this draft Guidance greatly concern us. Also concerning is the failure of the document to distinguish between Wilderness and Wild Forest in the application of the Guidance.

As noted in the Guidance, the Adirondack Park State Land Master Plan (APSLMP) recognizes that cross country ski trails are an historic and appropriate recreational facility on all classifications of Forest Preserve lands and, in compliance with the APSLMP, are to be “located and designed in essentially the same manner as foot trails and they are to have the same dimensions and character.” They are “to provide for reasonable access in a manner causing the least effect on the surrounding environment.”

### **Trail Standards**

**Cleared Width:** The Guidance lacks a justification for the construction of new cross country ski trails, regardless of trail type, which are potentially much wider than a

foot trail which, according to the DEC's Trail Construction and Maintenance Manual, are to be no wider than eight feet (8') cleared width.

Yet, the Trail Standards Chart on page 6 of the draft Guidance provides for a nine foot (9') standard for two-way Cross Country Ski Trails and, further, that "trails may be up to twelve feet (12') wide where the running grade exceeds 10%."

We see no justification in the Guidance for the construction of 9- 12 ' wide trails for cross country skiing on either Wilderness or Wild Forest portions of the Forest Preserve. Nine to twelve feet are the current maximum cleared widths for two-way community connector snowmobile trails in Wild Forest. We are at a loss to understand how these same dimensions can be justified as compliant with the APSLMP for muscle-powered, non-motorized cross country skiing in Wilderness areas.

In order to comply with the APSLMP definition that a cross country ski trail must be of the same dimension and character as a foot trail, APA should not approve a cross country ski trail cleared width greater than the eight foot cleared width dimension of a foot trail, as per the DEC's manual. That maximum cleared width should apply to both Wilderness and Wild Forest ski trails, regardless of grade.

It should be noted by the APA that an eight feet cleared width dimension, if approved in the final Guidance document, constitutes a doubling of the current DEC Wilderness standard for cross country (Nordic) ski trails, which is four feet cleared width.

**Leveling and Grading:** We oppose the permissive, unconditional statement that "limited leveling and grading may be undertaken where conditions restrict skiing. The need to excavate the ground surface within the trail is minimal as snow is the primary surface of the trail for skiing." No motorized equipment should be used for leveling and grading for Forest Preserve cross country ski trails that have the same dimension and character of a foot trail. It should be specified that such work, as may be necessary, is to be conducted using hand-tools only.

**Height:** Given deep snow under backcountry conditions, we can see a reason for the proposed maximum cleared height of backcountry cross country ski trails of twelve (12') feet. It should be noted by APA that, if approved, this would represent a two-foot increase from the 10 foot maximum cleared height now in effect for Cross Country ski trails in Wilderness.

DEC work plans for redeveloping existing ski trails or building new ski trails under revised and approved Unit Management Plans should always exercise the precautionary principle that boulder removal, limited side sloping only when absolutely necessary, etc. be utilized in conjunction with sustaining the Wild Forest and Wilderness character of the Forest Preserve landscape. As such, we support the recognition in the Draft Guidance that cutting of overstory trees is to be avoided.

**Enhancing Existing Trails for Backcountry Skiing:** In order to be APSLMP compliant, consideration for the natural resources and wild forest character of all Forest Preserve in the implementation of this Guidance must be paramount. Therefore, we ask the APA to add the following question to the list of questions for consideration by the DEC area manager found on page 11 of the draft Guidance: “Will actions negatively impact either the natural resources or wild forest character of the trail and surrounding area, or negatively impact any Wilderness management guideline in the APSLMP”?

Thank you for the opportunity to comment on this draft Guidance document.

Sincerely,

A handwritten signature in black ink, appearing to read "David Gibson". The signature is fluid and cursive, with a large initial "D" and "G".

David Gibson, Managing Partner

*Adirondack Wild: Friends of the Forest Preserve*  
P.O. Box 9247, Niskayuna, New York 12309  
[www.adirondackwild.org](http://www.adirondackwild.org)