



Department of
Environmental
Conservation

WILMINGTON WILD FOREST

Amendment

to the

2005 Wilmington Wild Forest Unit Management Plan

NYS DEC, REGION, 5, DIVISION OF LANDS AND FORESTS

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MEMORANDUM

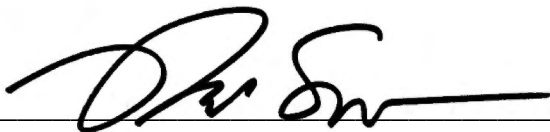
TO: The Record

FROM: Basil Seggos

SUBJECT: Wilmington Wild Forest

The Amendment to the 2005 Wilmington Wild Forest Unit Management Plan has been completed. The Adirondack Park Agency has found the Amendment to be in conformance with the Adirondack Park State Land Master Plan.

The Amendment is consistent with Environmental Conservation Law, and Department Rules, Regulations and Policies and is hereby approved and adopted.



Basil Seggos
Commissioner
New York State Department of Environmental Conservation

Date: August 9, 2016



Department of
Environmental
Conservation

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Adirondack Park Agency

LEILANI CRAFTS ULRICH
Chairwoman

TERRY MARTINO
Executive Director

**RESOLUTION ADOPTED BY
THE ADIRONDACK PARK AGENCY
WITH RESPECT TO THE 2016 WILMINGTON WILD FOREST
UNIT MANAGEMENT PLAN AMENDMENT**

July 14, 2016

WHEREAS, Section 816 of the Adirondack Park Agency Act directs the Department of Environmental Conservation (Department) to develop, in consultation with the Adirondack Park Agency (Agency), individual management plans for units of land classified in the Adirondack State Land Master Plan (Master Plan) and requires such management plans to conform to the general guidelines and criteria of the Master Plan; and

WHEREAS, in addition to such guidelines and criteria, the Master Plan prescribes the contents of unit management plans and provides that the Agency will determine whether a proposed individual unit management plan complies with such general guidelines and criteria; and

WHEREAS, in October 2005 the Department adopted a unit management plan for the Wilmington Wild Forest, located in Essex County; and

WHEREAS, the Department has prepared a draft unit management plan amendment for the Wilmington Wild Forest (the Plan) dated May 2016 which proposes the establishment of additional recreational trails that build upon the 2005 UMP and addresses management issues that have been identified over the past 10 years.; and

WHEREAS, the Department has made a Negative Declaration on December 9, 2015 finding that the proposed actions contained in the Plan will not have a significant effect on the environment and that no Environmental Impact Statement will be prepared; and

WHEREAS, the Department is the lead agency, and the Agency is an involved agency whose staff have been consulted in the preparation of the proposed plan; and

WHEREAS, the Agency is requested to determine whether the Plan is consistent with the guidelines and criteria of the Adirondack Park State Land Master Plan; and

WHEREAS, the Adirondack Park Agency has reviewed the Plan; and

WHEREAS, the Plan recognizes the need to protect the natural resources, improve public use and enjoyment of the area, avoid user conflicts and prevent overuse according to the guidelines and criteria of the Master Plan.

NOW, THEREFORE, BE IT RESOLVED, that pursuant to Section 816 of the Adirondack Park Agency Act, the Adirondack Park Agency finds the Wilmington Wild Forest Unit Management Plan Amendment dated, May 2016, conforms with the general guidelines and criteria of the Adirondack Park State Land Master Plan; and

BE IT FINALLY RESOLVED, that the Adirondack Park Agency authorizes its Executive Director to advise the Commissioner of Environmental Conservation of the Agency's determination in this matter.

Resolution adopted on this date, July 14, 2016.

AYES: Sherman Craig, Chairman, Chad Dawson, John Ernst, Karen Feldman, Arthur Lussi, Barbara Rice, William Thomas, Dan Wilt, Brad Austin, Lynne Mahoney, Bob Stegemann

NAYS: None

ABSTENTIONS: None

ABSENT: None

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I. Introduction

A. Background

The Wilmington Wild Forest (WWF) is located in the Towns of Wilmington, Jay, Keene, and Saint Armand in Essex County and the Town of Black Brook in Clinton County. A Unit Management Plan (UMP) for the area was completed in October of 2005. The 2005 UMP continues to guide the Department of Environmental Conservation's (Department) management of the WWF.

The 2005 UMP provided for the design and construction of multiple-use recreational trails. Over the past 10 years these trails have been built and the area has seen a growth in recreational use, particularly by mountain bikers.

This UMP Amendment proposes the establishment of additional recreational trails that build upon the 2005 UMP and addresses management issues that have been identified over the past 10 years. The proposed trail layout in this Amendment will maximize the user experience, while still conforming to Wild Forest guidelines. It will also limit the amount of maintenance needed to keep the trails in the best condition possible. This UMP Amendment will allow for better trail connections to the local communities, provide more trails that would be appropriate for beginner mountain bike riders, increase the recreational opportunities for persons with disabilities, and relocate some trail segments to better protect natural resources.

This UMP Amendment also updates some information from the 2005 UMP. Unless otherwise specified in this Amendment the management actions contained in the 2005 UMP remain in effect, as approved.

B. Area Overview

There are several updates to the acreages from the 2005 UMP. The updated values are listed here.

Table 1: Wilmington Wild Forest Components.

Tract	acres
Beaver Brook	710
Black Brook	1,191
Clements Mountain	1,347
Hamlin Mountain	346
River parcel in Jay	6
Signor Lane	45
Whiteface and Marble Mountains	3,440
Wilmington and Stephenson Ranges	9,853

The area of wetlands in the WWF, identified by Adirondack Park Agency (APA) mapping information, is presently about 318 acres, the 2005 UMP identified 206 acres.

II. Updated Inventory of Facilities

A. Bridges (22+)

- There are 13 snowmobile bridges.
- There are at least nine foot bridges.

B. Trails (33.29 Miles total)

- There are currently 23.2 miles of trail open for mountain bike use.
- There are 8.05 miles of snowmobile trail.
- There are 7.1 miles of trail open for foot use only.

Table 2: Existing trail inventory.

Name	Length (miles)	Trail Classification	Bikes allowed	Shown on Map #
All-In Trail	3.05	BT	Yes	6
Ausable River Access	0.76	V	No	1
Bluff Trail	0.38	BT	Yes	3
Bluff Trail Cutoff	0.01	BT	Yes	3
Cedar Trail	0.49	BT	Yes	3
Clements Pond Trail	1.25	III	No	1
Cobble Lookout Trail	1.19	III	No	1
Coniferous Trail	0.56	BT	Yes	6
Cooper Kill Cutoff	0.03	IV	Yes	1
Cooper Kill Trail	1.80	SM-I	Yes	1
Cooper Kill Trail	3.01	IV	Yes	1
Corridor Loop	0.40	BT	Yes	3
Corridor Trail	0.33	BT	Yes	3
Delta Cutoff 1	0.06	BT	Yes	3
Delta Cutoff 2	0.04	BT	Yes	3
Delta Trail	0.38	BT	Yes	3
Double Time Trail	0.59	BT	Yes	6
Erratic Trail	0.31	BT	Yes	3
Esther Trail	1.01	III	No	2
Flume Knob Trail	0.89	BT	No	3
Good Luck Trail	0.92	BT	Yes	6
Hardy Road Trail	0.11	BT	Yes	6
Make Believe Trail	0.84	BT	Yes	6
Marble Lane Trail	0.13	IV	Yes	3
Marble Mountain Trail	1.57	III	Yes	2
Marble Summit Trail	0.19	III	No	2
Ridge Trail	1.53	BT	Yes	3

Name	Length (miles)	Trail Classification	Bikes allowed	Shown on Map #
Ridge Trail Cutoff	0.04	BT	Yes	3
River Trail	0.1	V / ADA	Yes	3
Rock Garden Trail	0.59	BT	Yes	3
Safe Bet Trail	0.42	BT	Yes	6
Twisted Pine Trail	0.71	BT	Yes	6
Upper Connector Trail	0.43	BT	Yes	3
Wilmington Snowmobile Trail	3.28	SM-II	Yes	2
Wilmington Snowmobile Trail	2.96	SM-II	No	1
Wilmington to Whiteface Trail	1.11	IV	Yes	2
Wilmington to Whiteface Trail	1.79	IV	No	2
Total	33.29		23.2 miles	

Trail Classification corresponds to the standards listed in Appendix 7 of the 2005 UMP; I: unmarked route, III: primitive, IV: secondary, V: trunk or primary, BT: mountain bike, SM-I: secondary snowmobile trail, SM-II: community connector snowmobile trail, and ADA: accessible trail.

C. Trail Registers (4) and Informational Kiosks (2)

- Informational kiosk and trail register located at the Wilmington Flume- west side parking lot.
- Informational kiosk and trail register located at Beaver Brook Tract Parking Area.
- Trail register located on the Whiteface Mountain Trail near the reservoir parking area.
- Trail register located at the Clements Pond Trailhead.

D. Parking Areas (9)

- Beaver Brook Tract: developed off-road parking
- Black Brook Woods: road shoulder parking
- Clements Pond Trail: developed off-road parking
- Cobble Lookout Trail: road shoulder parking
- Cooper Kill Pond Trail- Bonnieview Road: small off-road parking and along road shoulder
- Cooper Kill Pond Trail- Gillespie Drive: road shoulder parking
- Marble Mountain Lane (at the Atmospheric Science Research Center): road shoulder parking
- Wilmington Flume- east side: off-road parking
- Wilmington Flume- west side: paved off-road parking

E. Gates (1)

- There is one gate located on the Wilmington Snowmobile Trail at Forestdale Road.

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III. Proposed Management Actions

A. Multiple-Use Trails Open to Mountain Bikes

Current Situation

The mountain bike trails proposed in the 2005 UMP have been built. There are currently 23 miles of multiple-use trails open to mountain bikes in the Wilmington Wild Forest. About 16 miles of this are regularly used by mountain bikes. The popular mountain bike trails are: the Flume Trails (map # 3), the Beaver Brook Tract (map # 6), and the Wilmington Snowmobile Trail (known to area mountain bikers as the Poor Man's Downhill, map #4). The first two are stacked looped trail systems and the other is primarily used as a downhill trail.

Mountain bike use in the area has increased since the 2005 UMP was completed. The trails have become a draw for visitors.

Department staff have been monitoring the trails to identify potential resource problems or user conflicts.

The majority of the trails are in good condition, but problems have been identified at some locations. Most of these problems are localized to a specific spot and these can be addressed through small scale actions (such as minor reroutes or construction of water diversion devices). There are three areas where more widespread trail problems are occurring:

- Wilmington Snowmobile Trail between the Whiteface Memorial Highway and Marble Mountain Lane (see map #4). This trail segment is about 0.6 miles long. This section of trail has several wet areas that have become muddy. Another problem is that there are multiple locations where rocks have been "armored" with logs. This was done to facilitate snowmobile use of the trail (which is the primary use of the trail), but this is an impediment for bike use. As a consequence bikes are riding around the obstacles causing trail widening.
- Wilmington to Whiteface Trail between the Wilmington Snowmobile Trail and the foot trail up the south side of Marble Mountain (see map # 4). This trail is part of the hiking trail from the Wilmington Reservoir to Whiteface Mountain. It was not designed as a mountain bike trail. This trail does not receive a lot of bike use, but does get significant hiking use. The listing of this trail in the mountain bike section of the UMP Amendment is not meant to imply that the damage to the trail has been predominantly caused by mountain bikes. One problem with this trail is that it passes through two large wet areas. In these areas where the trail was poorly laid out, users avoiding the wet areas have caused braiding and trail widening. Another problem spot on this trail is a stream crossing at the base of a steep embankment. Trail widening and stream bank erosion are resulting due to poor trail layout and users crossing the stream at multiple locations.

- The Cooper Kill Trail (map # 10). There are significant issues with parts of the Cooper Kill Trail including excessively steep slopes, erosion, trail braiding, and widening. The current condition of the trail is limiting use. The recreational opportunities at scenic Cooper Kill Pond include fishing, a lean-to, and access to trailless summits and a slide. The trail can be used as either a through trip or a round-trip. If the trail were in better condition, the through trail option would likely be most desirable for skiing and bike use.

Fat bikes are an increasing component of the mountain bike sport. These bikes have extra wide tires that make them well suited for use on snow. The WWF offers many opportunities for this recreational activity. Fat bikes are only allowed on trails that are open for mountain bikes. There are potential challenges and new impacts that may be created by an increase in fat bike use. Fat bikes could extend the bike riding season not only into the winter, but also into the spring mud season. While the design of fat bikes indicates that they may have little impact on the ground, the use will need to be monitored.

Management Actions

- A trail will be built to connect the Flume Trails to the Atmospheric Science Research Center (ASRC) area. This trail will be about one mile long. It will be built on the east side of Marble Mountain (see map # 4).
- A trail will be built from Marble Mountain Lane toward Wilmington Reservoir. This trail will require a major bridge over White Brook. The trail will be about 1 mile long. This trail will connect with the Wilmington Snowmobile Trail about 0.5 miles west of the reservoir (see map # 4).
- A trail will be built from the Flume Trails to the Wilmington Reservoir. This will require about two miles of new trail. This trail will connect to the Wilmington Snowmobile Trail near the State land boundary line. The route will use the Wilmington Snowmobile Trail for about 0.25 miles. This trail will be a connection with the Wilmington hamlet area to the Flume Trails (see map # 4).
- The portion of the Wilmington Snowmobile Trail between the Whiteface Memorial Highway and Marble Mountain Lane will be improved for mountain bike use. The presence of poorly drained soils (significant organic material) combined with summer use has resulted in erosion, ruts, mud, vegetation loss, and tread widening. To protect sensitive soils and provide for use, options to harden and stabilize the tread will be considered. A parallel trail may be considered after all other alternatives have been evaluated. This will be done in consultation with APA staff (see map # 4).
- A trail will be built leaving the Ridge Trail at about the 1500 foot elevation level and travel roughly north to the Marble Mountain Trail. This trail will be about 0.25 miles long (see map # 4).
- Close (to all use) the portion of the Whiteface Mountain Trail between the Wilmington Snowmobile Trail and the foot trail up the south side of Marble Mountain (see map # 4).

- A 500 foot section of the Marble Mountain Trail that is paralleled by the Ridge Trail will be closed (see map # 4).
- Beaver Brook Tract (Hardy Road, see map # 7):
 - A loop trail will be built south of the parking area to connect with the Coniferous Trail. There will be about 0.5 miles of new trail built to make this a loop connecting with existing trail. This trail will be built to accommodate beginner mountain bike riders. A bridge will need to be built over Beaver Brook.
 - A trail will be built to form a loop on the All-In Trail. This trail will be on the western side of the All-In Trail and will connect with the current trail near the 1,300 foot elevation and the 1,600 foot elevation. The trail will be about 0.4 miles long.
 - A trail will be built to provide an additional climb/descend option for the All-In Trail. This trail will be built with a more flowing style than the tighter turns of the current trail. This trail will also be built with a lower slope than the current trail. This new trail will be about 0.75 miles long.
 - The Department may establish connecting trails between adjacent private lands and the existing trails on the Beaver Brook Tract. The purpose of these new trails would be to provide better connections to the local communities or provide public access to trails on private property. The location of these trails will be decided based on the most suitable location. Formal agreements or easements with the private landowners must be in place before trail connections are established. Any trails built under this provision will be developed in consultation with APA staff.
- Cooper Kill Trail (map # 10) will be relocated and improved for all allowable uses. The following alternatives were considered. The preferred alternative is number 4. A discussion of snowmobile use on this trail is in the snowmobile trails section.

Alternatives considered:

 - 1) Take no action. No changes or improvements will be made to the trail beyond what would be considered ordinary maintenance and rehabilitation under the DEC-APA Memorandum of Understanding. The environmental problems from erosion and trail widening would continue and likely become worse. Most of those who use the trail would find it to be an unpleasant experience.
 - 2) Close and reclaim the entire trail. Based on the amount of use, it would seem reasonable to close the trail; however, the condition of the trail is a reason that it does not receive more use. There would be much less work required to close and rehabilitate the trail than some of the other alternatives. This alternative would resolve the environmental issues, but would eliminate a valuable recreation opportunity.
 - 3) Close one of the approaches to Cooper Kill Pond, so the trail would end at the pond. The portion of the trail that remains open will be relocated and improved as needed to make it environmentally sustainable and useable

for recreation. This would reduce the amount of trail work that would be needed when compared to repairing and rerouting the entire trail. This alternative would eliminate the through use option that some people desire.

- 4) **Preferred alternative:** Relocate and improve the trail as needed to make it environmentally sustainable and useable for all allowable recreation (see map #15). The eastern and western side of the trail will be rerouted. The western reroute will use the Wilmington Snowmobile Trail for a distance and then rejoin the current Cooper Kill Trail at a higher elevation to avoid the worst sections of trail. The trail will also be rerouted around Cooper Kill Pond to avoid a wetland and stream crossings. The eastern section of trail will be routed to a ridge line east of the pond. If the trail were in better condition the trip to Cooper Kill Pond would be more enjoyable and more people would use the trail. Cooper Kill Pond is unique because of its elevation and the presence of a lean-to. While addressing the erosion problems from the trail would provide environmental benefits, an increase in use could result in more visitor impacts at the pond. Some of the impacts from increased use will be mitigated by the trail being relocated to a better location around the pond. The distance from the nearest parking area to the pond is enough that the pond should not be significantly impacted by a higher level of use. Further field work is required to identify the reroutes and specific actions to improve the trail. The strategy for the re-routes will be to route the trail to areas with better grades, use the sections of current trail that are not eroded, avoid the wetlands just west of Cooper Kill Pond, and incorporate scenic vistas. The trail reroutes and improvements will take the allowed uses (mountain bike, hiking, or cross-country ski) of that segment into consideration. Trail construction will be done pursuant to work plans and in consultation with APA staff. If the additional field work discovers that this alternative is not practical then alternative 2 or 3 will be implemented.
- There are some trails that mountain bikes will not be allowed to use. Reasons to not allow mountain bikes on a trail include the slope of the trail, soil conditions, and to avoid user conflicts. Mountain bikes will not be allowed on the following trails: Ausable River Access (map # 1), Bear Den (map # 3), Clements Pond (map # 1), Cobble Lookout (map # 1), Esther (map # 2), Flume Knob (map # 3), Whiteface Mountain (including the portion up Marble Mountain) (map # 2), and Wilmington Snowmobile Trail (between Forestdale Road and the intersection with the Cooper Kill Trail) (map # 1).
 - When trails are laid out the inclusion of scenic vistas in the route will be a priority consideration.
 - Monitor winter bike use of the trails for impacts to natural resources and user conflicts. Issues that are found will be addressed on a graduated basis.
 - The trail proposals in this UMP Amendment require work to finalize the exact layout. This will be done in consultation with APA staff.

B. Hiking trails

Current Situation

Most of the hiking trails proposed in the original UMP have been built. These new trails are the Ausable River Access (map #1), Bear Den (map 3), Clements Pond (map #1), Cobble Lookout (map #1), and Flume Knob (map #3) trails.

Several trails in the unit have significant problems.

- Although officially closed in the 2005 UMP, the old T-bar line up Marble Mountain (map #2) has continued to be used. Significant erosion is occurring along this path. Over the final 800 feet of elevation gain to the summit of Marble Mountain, this trail has a slope of about 28 percent.
- Trail up the southern side of Marble Mountain (map #2). This trail is a segment of the route to Whiteface Mountain from the Wilmington Reservoir. This trail is eroding. Over the final 800 feet of elevation gain to the summit of Marble Mountain, this trail has a slope of more than 30 percent. There are also issues with the trail on the approach to the Marble Mountain Trail, these are listed in the mountain bike section above.

Management Actions

- One trail proposal in the 2005 UMP that was not built was the Signor Lane Trail. This trail will not be built. This trail is located on a small, isolated parcel and is expected to receive little use and therefore would not justify the expenditure of resources to build it.
- Marble Mountain Trails (see map # 4):
 - A trail will be built from Marble Mountain Lane, at the parking near the ASRC, to the summit of Marble Mountain. This trail will follow some of the old ski trails on the north side of the mountain. The new trail will be about one mile long. This trail will be about 0.25 miles longer than the trails currently being used. This is required to reduce the slope of the trail. This trail will have a slope of about 15 percent over the final 800 feet of elevation gain to the summit of Marble Mountain.
 - A trail will be built that will connect the new Marble Mountain Trail with the parking at the reservoir. This way a trail up Whiteface Mountain will still start close to the hamlet area of Wilmington. This trail will use the current hiking trail for about 0.6 miles and there will be 0.4 miles of new trail built. It was decided not to use the Wilmington Snowmobile Trail for this hiking trail because of potential conflicts from mountain bikers riding downhill. The terrain in the area may force some overlap with the trails, but a goal will be to limit the distance of any overlap. This trail will be closed to mountain bikes.

- 1.4 miles of the current trail up Marble Mountain from the south will be closed. The section being closed starts about 0.6 miles from the reservoir parking area and then continues to the summit.
- The trail on the T-bar line will be closed and reclaimed.
- The classification of the following trails will be upgraded from primitive (III) to secondary (IV) as per the trail classification system found in Appendix 7 of the 2005 UMP: Bear's Den, Clements Pond, and Flume Knob.
- The classification of the Whiteface Mountain Trail will be upgraded from secondary (IV) to primary (V) per the trail classification system found in Appendix 7 of the 2005 UMP.
- The classification of the Cobble Lookout Trail will be upgrade from primitive (III) to primary (V). This trail will also become a nature and interpretive trail as allowed in the Adirondack Park State Land Master Plan. Interpretive signage may be added to this trail to address the historic use (a rock quarry) and natural features along the trail and at the scenic vista. A spur trail to the quarry rock face may be built.
- Restoration work will be done on closed trails in order to mitigate and to discourage use.

C. Snowmobile trails

Current Situation

The snowmobile trail proposals in the 2005 UMP have been completed. A community connector trail was built from the hamlet of Wilmington to Forestdale Road (where the trail links to the wider trail network) and the trail from Bonnieview Road to the Cooper Kill Pond has been closed to snowmobiles (see map #10).

Since the approval of the UMP, guidance has been developed for the siting, construction, and maintenance of snowmobile trails in the Adirondack Park. The guidance established a snowmobile trail classification system. This guidance has been placed as an appendix to the *Memorandum of Understanding between the Adirondack Park Agency and the Department of Environmental Conservation Concerning Implementation of the State Land Master Plan for the Adirondack Park*. (http://www.apa.ny.gov/State_Land/Appendix_E.pdf).

No Material Increase

In March of 2008 the APA adopted a resolution which found that the existing Department policy, which places a cap on the total snowmobile trail mileage on all wild forest units at 848.88 miles, is consistent with the Adirondack Park State Land Master Plan Wild Forest Basic Guideline #4. The resolution also outlined the format in which snowmobile trail mileage should be presented in unit management plans to ensure continued compliance with Basic Guideline #4.

The tables below represents changes that have occurred beginning with the adoption of the 2005 UMP through the changes being proposed in this UMP.

Base Snowmobile Trail Mileage (pre 2005 UMP): 5.61 miles
 Proposed Closure Mileage: 4.42 miles
 Proposed New Trail Mileage: 7.21 miles
 Total proposed Trail Mileage (post UMP Amendment): 8.40 miles

Table 3: Park-wide Trail Mileage.

1972 Mileage	Estimated Existing Mileage in All Wild Forest Units	Proposed Net Gain/(Loss) of Mileage in WWF	New Total Estimated Mileage in All Wild Forest Units	Total Allowable Wild Forest Mileage * *Mileage beyond which would be considered a "material increase"
740	777.34	2.79	780.13	848.88

Table 4: Snowmobile trails in the WWF.

Name	Class	Current Length on WWF Lands (miles)	Proposed Length on WWF Lands (miles)
Cooper Kill Snowmobile Trail	I	1.80	2.16
Wilmington Snowmobile Trail	II	6.24	6.24
Total		8.05	8.40

Management Actions

Reroute the Western portion of the Cooper Kill Trail to accommodate all allowable uses including snowmobiles. The preferred alternative is number 3-C.

Alternatives considered

1- Reopen the entire Cooper Kill Trail to snowmobiles: Public comment received during the development of this UMP amendment requested that the trail from Cooper Kill Pond to Bonnieview Road be reopened for snowmobile use. This was considered, but was not selected for implementation because this section of trail would not comply with snowmobile trail sitting guidance for several reasons. Excessive slopes and separation from motorized travel corridors are the most notable (see map # 11).

2- Close the entire Cooper Kill Trail to snowmobiles: The Class I portion of the trail to Cooper Kill Pond is used by local snowmobilers when conditions allow, but overall use remains relatively light during the winter season. The Cooper Kill Trail is in rough

condition and needs significant work. This work is needed for all trail uses, not just snowmobiling, so closing the trail to just snowmobiles would not significantly reduce the work required.

The greatest distance from this trail to a motorized travel corridor is almost 1.7 miles (at Cooper Kill Pond). The snowmobile guidance states that new and rerouted Class I trails which connect directly with a Class II trail be no further than one mile from a motorized travel corridor. Since this trail is already in existence and receiving regular use it can remain open, but significant separation from the nearest motorized travel corridor and unsustainable trail conditions require that the possibility of closure be considered.

In addition to the criteria from the guidance, another reason to consider closing this trail to snowmobiling is the opening of the Wilmington Community Connector Snowmobile Trail. This trail could provide a recreational destination that is similar to what the Cooper Kill Trail provides. Snowmobilers traveling from Wilmington have a connection to Taylor Pond, which has three lean-tos on its shore. It is about 4.5 miles longer for a trip from Wilmington to Taylor Pond than a trip from Wilmington to Cooper Kill Pond. However the travel to Taylor Pond would be mostly on Class II trail, which would be a different experience than the current Class I trail to Cooper Kill Pond.

While this is a viable alternative it was not select because the unique snowmobile experience that this trail provides is of significant recreational value that is worth retaining (see map # 12).

3- Continue to allow snowmobile use to Cooper Kill Pond: A snowmobile ride to Cooper Kill Pond is a unique and valuable recreational opportunity. There are no other Class I trails in the unit and there are not many snowmobile trails that are at this elevation. The potential for increased impacts from continued snowmobile is low. Snowmobiling is an established use, and there are unlikely to be new impacts from their continued use. There will be a trail to Cooper Kill Pond for other uses, allowing snowmobile use on the trail would result in a minimal increase of impacts. All of the following options provide access to Cooper Kill Pond for snowmobiling.

A. Reopen the eastern portion of the Cooper Kill trail from Bonnieview Road and close the western portion from the Class II Community Connector trail: The eastern portion of the Cooper Kill trail was open for snowmobile use until the implementation of the 2005 UMP. Rerouting this portion of the trail in a manner that is entirely consistent with the snowmobile trail guidance would be impossible due to unavoidable steep side slopes. With the exception of snowmobilers living on Bonnieview Road, everyone using the trail would need to trailer their snowmobiles to the trailhead which does not currently have a parking area able to accommodate trailers. The trail starts more than three miles from the Wilmington hamlet area, and can be reached by riding along plowed roads (see map # 13).

B. Keep the current trail open to snowmobiles and build a reroute for non-motorized summer use: The current trail would require restoration work and some minor

reroutes to address erosion problems and to eliminate hazards for snowmobile use. A new trail would be built on suitable terrain to accommodate summer use. This new trail would use existing trails as much as practical. A trail designed with only summer use in mind could be a better recreational experience, particularly for some mountain bikers, by being able to flow better than trail also designed to accommodate snowmobiles. A trail built to only handle summer use would be narrower than a snowmobile trail. Under this alternative there would be greater maintenance requirements, more environmental impact, and more initial work than if just one trail was used for all uses; however given the length of trail involved (about 1.6 miles of new trail built for summer use) under this alternative this will not be a significant concern. Work would be required to prevent summer use of the snowmobile trail, but many people would prefer to use a well laid out trail than a slightly shorter trail with problems. (see map # 14).

C. Preferred Alternative- Reroute the Western portion of the Cooper Kill Trail to accommodate all allowable uses including snowmobiles: The Management Guidance for Snowmobile Trail Siting, Construction and Maintenance states that rerouted Class I trails that are connected to Class II trails (e.g. the Cooper Kill Pond Trail) will be located no farther than one mile from motorized travel corridors (e.g. Gillespie Dr.). Currently, the Cooper Kill Pond Trail extends more than one mile from Gillespie Dr. At its greatest distance, this trail is almost 1.7 miles from a motorized travel corridor (at Cooper Kill Pond). The Guidance's provisions were not intended to restrict existing Class I trails that are greater than one mile from a motorized travel corridor from being relocated to address natural resource challenges. The intention of the provision is to prevent new Class I snowmobile trails from being located outside one mile of a motorized travel corridor. In addition, the intention of the Guidance is to prevent existing Class I snowmobile trails located inside one mile of a motorized travel corridor from being rerouted further than one mile from a motorized travel corridor. This alternative complies with the provisions of the Management Guidance for Snowmobile Trail Siting, Construction and Maintenance.

This alternative continues to provide a traditional Adirondack snowmobile experience on a Class I trail to a compelling destination. The new route will be a better snowmobile trail because grades will be improved, erosion problems addressed, and site-lines improved over the current trail alignment. This alternative would allow sections of the current trail to be closed and completely rehabilitated.

It is estimated that this will require the closure of 1.3 miles of trail and the construction of 1.65 miles of new trail, which will result in an increase of 0.35 miles of snowmobile trail. About 0.51 miles of the existing trail will continue to be used. Further discussion of this trail is in the hiking trails section (see map # 15).

D. Ski use

Current Situation

Skiing is a recreational activity that occurs in the WWF, yet it was not addressed in the 2005 UMP. The WWF provides a variety of recreational opportunities for skiers: trails are used for traditional cross-country skiing, sections of snowmobile trail provide for more of a challenging downhill experience, and there are areas in the backcountry that are being used for off-trail skiing.

Proposed Management Actions

- Where practical, new trails, reroutes, and trail structures will be designed and constructed to accommodate and enhance ski use. This will be prioritized for trails which could receive significant amounts of ski use, particularly the Cooper Kill Trail (map #10).
- To better accommodate skiers, sections of trails that have steep slopes may be cut wider; following trail guidance. At the base of steep slopes the trail width will gradually taper down.

E. Signage

Current Situation

Trail identifying signs have been placed at trail intersections at the Flume and Beaver Brook mountain bike areas. These signs have been placed on posts and oriented so that users can view the signs from as many angles as possible.

Proposed Management Actions

- With an increase in user groups, signage will attempt to minimize overlap in uses. This will allow each user group to have a unique experience associated with that activity. An example is that while hikers can use any trail, they will be encouraged through signage to avoid specific trails.
- Interpretive signage may be used on the Cobble Lookout Trail and the new accessible trail at Hardy Road. These signs will be made of rustic materials and will be limited in number.

F. Parking areas

Current Situation

Several of the parking areas proposed in the 2005 UMP have been built or improved, but there are also several that have not been built. The parking areas that were built or improved since the 2005 UMP serve the following trails: Flume network, Beaver Brook Tract, and Clements Pond. A parking area is planned for the Cobble Lookout Trail. In the adjacent Taylor Pond Wild Forest a parking area was built for the Catamount Trail and the Wilmington Snowmobile Trail.

Proposed Management Actions

- The parking area at the Beaver Brook Tract will be improved and will be moved further from the road. The new parking area will be designed with an access drive to a square parking area. This will eliminate the need for cars to back into Hardy Road. The parking will be designed to accommodate a total of 12 vehicles (map #8).
- The current parking area along the shoulder of Marble Mountain Lane near the Atmospheric Science Research Center will be improved. This area will provide parking for 10 vehicles (maps # 5).
- The Forestdale Road (three on the south side) and Black Brook Woods (Ausable River Access) parking areas proposed in the 2005 UMP will be not be built (map #1).

G. Access for persons with disabilities

Current Situation

Several facilities have been built in the WWF to improve recreational opportunities for persons with disabilities. The highest profile of these is at the Flume Trails, where a parking area, trail, and wildlife/scenic viewing area were built.

Management Actions

- An accessible loop nature and interpretive trail will be built from the Hardy Road parking area to a scenic vista of a wetland. The trail will be on the west side of Hardy Road. This trail will be about 0.3 miles long. An accessible picnic area with a table and fire ring will be built near the vista. The trail will be built with a cleared width of up to 8 feet wide and a tread width of up to 6 feet wide at passing spaces (see map # 7).
- An accessible nature and interpretive trail will be built from the Hardy Road parking area toward the south. This trail will be at least 500 feet long. The accessible trail may be built to loop back to the parking area along other trails in this area. If this is done the trail will be about 0.4 miles long. The trail will be built with a cleared width of up to 8 feet wide and a tread width of up to 6 feet wide at passing or resting spaces (see map # 7).
- The 1.4 miles long accessible trail in the Black Brook Woods/ Vanderwhacker Flats area proposed in the 2005 UMP will not be built. The construction of this trail to accessibility standards would be an elaborate under taking, but the primary reason that this proposal is being removed is that the anticipated recreational value would be low (see map # 1, Ausable River Access Trail).

Appendix A. Summary of Public Comment

The following is a summary of comments to the Wilmington Wild Forest UMP Amendment. The public comment period ended on January 22, 2016. Where warranted, a response from the Department is included in italics.

Trails

The Wilmington Area has become a destination for mountain bikers. The problem is there isn't an area with a high density trail system. This type of system if properly managed should have no effect on the ecosystem in that area.

Response: *The density of trails on the WWF is limited by the need to preserve a wild forest character. Trails have an impact on the immediate trail corridor as well as the surrounding area, but proper trail development and management helps to reduce or mitigate these impacts so that they are not significant.*

I believe the Hardy Rd area could also use facilities such as an ecofriendly restroom and a bike washing station typically found on some of the best trail systems.

Response: *A bike washing station would not be allowed on a wild forest area according to the APSLMP. A pit privy will be built at the parking area.*

I find that the out of state mountain biking to be a significantly better experience not because the terrain is any better, it is because there local government has put more money and effort into it. The Adirondack Park should be a premier destination for mountain biking, but it lacks the development from NY State. The local community has been making leaps and bounds when it comes to making new trails and you can see that people are starting to travel to ride them.

There are already plenty of hiking trail throughout the area. What the area is lacking is more mountain bike trails. Which can be multipurpose for hiking also.

I drive from Saranac Lake (past the Mount Pisgah and Dewey Mountain MTB trail systems) to ride in Wilmington, I choose to ride at Hardy Road due to the combination of challenging terrain, quality of the trails, variety of trail options, and the overall scenic nature of the Hardy Road trail system.

The expansion of mountain biking opportunities has certainly had a positive economic impact in the Wilmington/Lake Placid community. I feel strongly that improving this trail system would benefit the Wilmington/Lake Placid communities in countless different ways. Outdoor recreation/tourism is one the most important key economic drivers in our area. The expansion and improvement of the Hardy Road trail system would help to

further distinguish Wilmington/Lake Placid as a leader in outdoor recreation/tourism opportunities in the state.

I am not a mountain biker, but what I hear is it would be good to have more beginner and family level trails.

Significant mileage of interconnected singletrack trails (not just re-purposed dirt roads) is the defining feature of the most successful mountain biking destinations (in terms economic impact and opportunities for high quality riding experiences for mountain bikers). Additionally, the Wilmington area can benefit from additional backcountry ski touring trails where the terrain and snow patterns make such trails feasible for long-term winter use. When properly designed and constructed, trail networks for mountain biking, hiking and ski touring can provide a quality recreational experience without jeopardizing the unique “wild forest” character of the Adirondack Forest Preserve. High quality trail networks that are accessible to the public provide a long-term contribution to the economic base of the communities in which they are located, and an ongoing positive effect on the health and quality of life of local residents who use the trails. Wilmington may be the most well suited Adirondack community to economically benefit from trails-based tourism.

Supports all of the proposed management actions for the area between the Flume Trail network, the Wilmington Snowmobile Trail (aka. The Poor Man’s Downhill), Marble Mountain (Maps #4 & #5), Beaver Brook Tract (aka. Hardy Rd, Map #7), and the preferred alternative number 4 for the Cooper Kiln trail.

Would like to see more trails open to mountain biking and skiing that reach scenic vistas, and this would allow for the kind of experience which is currently limited in the unit.

Response: *A statement has been added to the plan stating that an objective of trail development will be to incorporating scenic vistas.*

With respect to Ski Use supports the proposal to design and construct new trails, reroutes and trail improvements to accommodate and enhance ski use of the unit where practical and sustainable. The trails at the Flume rarely have enough snow coverage to provide for decent ski touring. It is worth noting that the Wilmington Snowmobile Trail (aka. The Poor Man’s Downhill) sees a high level of use by cross-country skiers when conditions allow.

Response: *The ski use section of the plan has modified to remove the Flume Trails from the list of trails that area frequently used for skiing.*

Though it is not proposed in the DRAFT UMP, commenter continues to support the creation of a bike trail connection to the Taylor Pond Wild Forest. Most of the snowmobile trail to Forestdale road is suitably built as a summer route, but certain sections need work in the form of tread hardening or other solutions before being

suitable for regular bike use. Just as the “Poor Man’s downhill” is now a suitable summer route, the trail down to Forestdale road could also be improved to support some summer use. A bike trail connection to the adjacent Taylor Pond Wild Forest, along with proposed improvements in the area of Cooper Kiln Pond, will create opportunities for long-distance backcountry rides, something that the Wilmington Wild Forest is uniquely prepared to offer if steps are taken to improve these trails.

Response: *A mountain bike connection to Forestdale Road will require further study; it will not be included in this plan, but may be considered for future revisions.*

Cooper Kiln: It is encouraging to see the West side of the Cooper Kiln trail being rerouted. Notably, the East side of the Cooper Kiln trail is in even worse condition than the West side, and needs a re-route as well. A well-graded re-route of the East side could accommodate hikers, bikers, and skiers. Naturally existing viewpoints along the new route can be incorporated on the shoulder of Morgan Mountain looking south and east. Opportunities for bike trail access to viewpoints are exceedingly rare. Hiking-only trails to viewpoints are commonly available on Forest Preserve lands (several in Wilmington Wild Forest), but bike trails with a viewpoint are relatively rare. The Good Luck trail and (arguably) the All In trail, are examples of bike trails with viewpoints. Viewpoints add tremendous value to any trail users experience, but particularly the mountain biking experience due to their rarity. Even as one of the more challenging mountain bike trails in the region, the Good Luck trail is popular for cyclists and other trail users. The viewpoint is a significant contributing factor in its popularity. The reroute of the east side of the Cooper Kiln trail is a significant undertaking, but it does not require the same level of in-depth evaluation of alternatives as was developed for the west side. If the user mix remains typically non-motorized (hike, bike, ski) a re-routed trail to accommodate these uses can be built using well established best practices. A backcountry ski trail opportunity could also be incorporated in the vicinity of the rerouted east side trail where elevation, slope, aspect, and forest type facilitate it.

Response: *Language has been added to the plan clearly stating that the east side of the Cooper Kill Trail will be rerouted, a possible route is mentioned, and efforts will be made to incorporate viewpoints into the reroute.*

With respect to ski touring and mountain bike use of the trail between Cooper Kiln Pond and Bonnieview Rd, commenter strongly urges DEC to allow for trail improvements and possible re-routes that will better protect resources, prevent further trail erosion and improve user experiences.

See previous response.

Commenter strongly urges to DEC to allow for the design and construction of a new trail for non-motorized uses, including mountain biking and ski touring, which is not currently proposed in the DRAFT UMP. The new trail would begin in the vicinity of Cooper Kiln Pond, and would then ascend to the ridgeline to the Southeast of the pond, traverse the ridgeline, and then descend back to the existing trail from Bonnieview Rd. This would

form a non-motorized “lolly-pop” loop on the portion of the Cooper Kiln Trail that is currently closed to snowmobile use.

Response: *The trail east from Cooper Kill Pond is in poor condition and will be rerouted. Sections of the current trail will be closed and rehabilitated, which would eliminate the possibility of making it into a loop trail. Additional trail proposals for this area will be considered for future revisions of this plan after the problems with the current trail are addressed.*

Cobble Lookout: This new trail is a wonderful addition, and adding an interpretive opportunity is a great idea. These improvements need not preclude allowing bicycle use. Bike trails to view points are exceedingly rare, and there is no other community in the Adirondack Park with a greater commitment to serving the interests of mountain bikers than Wilmington. The interpretive opportunity on the Cobble Lookout trail has value to all users who would take an interest in the exhibits, regardless of their mode of travel. Experience with several other local trails indicates that use conflicts are often perceived as a much more serious problem than they actually are. With that said, I wouldn't suggest that use conflict isn't an important consideration, because it absolutely is. However, I do suggest that the importance of sharing trails is an especially important consideration on Wild Forest lands, and I recognize the management challenges associated with it. Trail users who prefer to not encounter any bikers have several options to do so. Fortunately, Wilmington Wild Forest will continue to have several great short hikes where not encountering any cyclists is assured. As for Cobble Lookout, instead of an immediate closure, I hope you'll consider actively monitoring usage via rangers, volunteers and others to inform management, instead of insisting upon a pre-emptive closure. When the Department has worked with the mountain biking community, volunteer efforts to build and maintain trails have increased dramatically, and the positive results are evident. Perhaps a more inclusive approach could be considered in this location. In any case, not allowing bike use does not excuse or correct deficiencies in the cobble lookout trail design. In its current condition, the Cobble Lookout trail is not prepared to sustain the higher level of traffic it is certain to receive as its popularity grows (foot or tire). The existing trail configuration is prone to erosion, widening, and muddy conditions in several locations. The difficulties presented by the terrain are formidable, but they are not insurmountable. It appears that the current layout attempted to avoid bench-cutting and structures by placing several sections of the trail directly into the fall line with slopes approaching and exceeding 15% in areas with a high water table and rocky poor soils (avoiding bench cuts by going into the fall line is a design strategy that is only reasonable for exclusive winter-use trails that will have snow as a tread surface and remain undisturbed once the snowpack has melted. Sacrificing sustainable grades to avoid difficult terrain typically facilitates widening and erosion that must be corrected at a later date, often with intensive high-maintenance trail structures or re-routes). The changes I envision would facilitate moving the trail away from rare and sensitive plant communities along the route, re-aligning the trail to more sustainable grades, and hardening the tread surface where soils are poor. The stone staircase on this trail offers little resource protection benefit. A low-profile retaining wall could be built with equal or less effort and resources in the same location where the

staircase is currently located to carry the trail tread over rugged terrain without the hazard and heavy impacts associated with stone stairs. My critique notwithstanding (and thank you for hearing me out), the department and its partners deserve accolades for moving this project forward. The community is well served by the addition of the trail, and I hope it stays in good condition.

Response: *The Department will work to address the problem locations in this trail so that it will be able to sustain an increase in use. The Cobble Lookout Trail will remain closed to mountain bike use. It is expected that the use of this trail will be different from other hiking trails. It is hoped that this trail will appeal to visitors who see other hiking trails as too challenging. While there are plenty of examples of this type of trail being used enjoyably by both hikers and bikers (for example the trails at Henry's Woods, near Lake Placid), there are differences with the Cobble Lookout Trail that result in the decision to keep it closed to bikes. As a bike trail the experience on the Cobble Lookout Trail may not flow well with the experience on the trails that would be used to reach it. This relatively short, out-and-back trail may result in more visitor conflicts as a shared use trail.*

Balance increases in mountain biking trails with opportunities for more passive forms of recreation, particularly hiking and skiing. Part of what makes mountain biking compelling in the Wilmington Wild Forest is the energetic and responsible engagement by biking stakeholder groups and their commitment to building and maintaining well-designed mountain bike specific trails. These trails provide for a biking experience not readily found in other parts of the Park and are the standard for others to follow. That said, their specificity in design and use does not readily support more passive forms of recreation. As recreational opportunities are expanded in the Wilmington Wild Forest, additional resources need to be identified that would open up new areas for the public to access and explore that are not mechanized and offer a more meditative experience.

The Marble Mountain trail parallels the Ridge trail and uses an old woods road built in the fall line next to the stream while the ridge trail switch backs on the adjacent hillside. The Marble Mountain trail should be closed in this location, especially considering the proposed closure of the hiking-only section of trail above this location. This is only a 600±' section of trail, but it is particularly problematic because it tends to confuse trail users due to the duplicity of the trails and the tendency for downhill travelers to miss the turn to connect to the ridge trail and the more preferable switchback descent.

Response: *The closure of the segment of the Marble Mountain Trail has been added to the plan.*

Where the Ridge Trail follows the 1500' contour, continue the trail across the hillside to the North, staying on or close to the 1500' contour, and connect with the Marble Mountain trail just before the first stream crossing (this adds approximately 1/4 mile of new trail). This short connection creates a nice loop, and trail users seeking to traverse the mountain side will not need to loose elevation as they connect between the Marble Mountain and Ridge trails. This addition will improve the backcountry character of the

riding at the Flume network. The terrain in this area is generally suitable for trail development, albeit rocky and somewhat rugged; not unlike the rest of the Ridge trail.

Response: *A proposed trail from the Ridge Trail to the Marble Mountain Trail has been added to the plan.*

Create a loop trail (more like a horseshoe on the North side of route 431) using the Cobble Lookout trail that connects to the proposed parking area on Marble Mountain road. In addition to the more diversified recreational benefit, parking for the trail is improved by allowing trail users to park in two locations to access this popular trail, instead of just one, thus reducing crowding when it is particularly busy.

Response: *Field work will be required to determine if the terrain between Cobble Lookout and State Route 431 is suitable for a trail. This may be considered for future revisions to the plan.*

Would like to call attention to the user conflict that will occur in the Flume Trail network with the proposed trails. In the proposed trail relocations, there will be a small segment (approximately .25 miles) of foot trail that will overlap with the Wilmington Snowmobile Trail just south east of the SUNY Atmospheric Sciences Research Center. As this snowmobile trail has significant use as a downhill mountain bike trail, it would be in the public's interest to relocate the hiking trail so that it does not share the snowmobile trail.

Response: *The plan has been modified to state that goal will be to limit the distance the foot trail will overlap with the Wilmington Snowmobile Trail. The terrain at this location may compel some overlap.*

On the Marble Mtn. trail reroute, my thoughts are a rehab of the present route would work, no trees to cut, water bars could easily be installed. I have walked it several times in the fall. I think people will still be using the route anyhow.

Response: *The steepness of the Marble Mountain Trail would make it difficult to successfully prevent further erosion if the trail remained open for use. It will be an ongoing process to restore and prevent use of the trail.*

I would like to express my support for the proposed changes to the Marble Mountain hiking trail and parking area. In the few years that I have worked here at Marble Mountain Lodge there have been hundreds of hikers that have approached me asking where the trail to Whiteface is. Use of this trail is growing significantly. Signage and additional parking are desperately needed here. I have witnessed over thirty vehicles parked here on holidays and weekends.

Snowmobiling

Given the stated preference within the Draft UMP Amendment to keep the Class I Cooper Kill Trail open as a traditional Adirondack snowmobiling experience, the commenter asks the DEC to replace Preferred Alternative 3C with Alternative 3B. DEC must adhere to the management directives found within the 2009 Snowmobile Trail Siting, Construction and Maintenance document, particularly with regard to the building of any new snowmobile trails. Alternative 3B allows DEC to stay true to the fundamental objectives of the Snowmobile Guidance, maintain and improve natural resource protections, and provide for a better recreational experience for all user groups. Designing a separate network of trails that could accommodate and separate non-motorized use to Cooper Kill Pond from the current snowmobile trail would help reduce further natural resource degradation and allow each trail section to be managed in a more appropriate manner. However, the building of a *new* all-purpose trail as suggested in Alternative 3C that would accommodate snowmobile use would not be in compliance with the Snowmobile Guidance because it is 1.7 miles from a motorized travel corridor.

Response: *More information has been added to the plan justifying the selection of Alternative 3-C. This alternative complies with the overall intent of the snowmobile guidance because it provides a net benefit to the Forest Preserve by providing a more sustainably designed trail that will accommodate a greater diversity of users in all seasons. The trail to Cooper Kill Pond does not fit with the situations that provision was intended to address.*

Commenter is concerned about the Cooper Kill Trail preferred alternative 3C. The alternative mentions in the first line “This alternative would not be in strict compliance with the snowmobile guidance due to the separation distance from the closest motorized travel corridor”. If an alternative plan goes against the snowmobile guidance document and yet is still the preferred alternative, what is the point of having a guidance document? Commenter is skeptical that such a trail would truly reduce the impact on the forest preserve, as more forest will be cut away to provide for the trail. Furthermore, this plan maximizes the impact area of the trail by creating multiple loops. The impact zone of trails extends from their edges into the surrounding forest preserve (especially with motorized uses such as snowmobiling whose impact can exceed 1000 ft) and loop trails maximize that “edge effect”. As the snowmobile use of the Cooper Kill Pond is light it would make sense for the DEC to manage the trail for more popular uses such as mountain biking and skiing. Commenter suggests the DEC consider an alternative similar to 3B that instead closes only the section of original snowmobile trail east of the proposed reroute. This would alleviate the wetland/swamp issues related to this section of trail, maintain a loop system for non-motorized use, and still provide motorized access to Cooper Kill Pond.

Response: *The maps for the plan have been modified to make it clear that intent is not to create a loop trail for snowmobile use. Also see the above response.*

There are already plenty of snowmobile trails. I am a snowmobile-er and must say the expansion of that trail system is unnecessary.

Multiple Use Snowmobile trails in WWF: The typically thin snowpack in Wilmington's lower elevation zones dictates that snowmobile use will continue to be almost exclusively enjoyed by primarily locals during the relatively small window of time when the trails happen to have sufficient snowpack to be rideable. Wilmington's weather and snow conditions are likely too inconsistent to attract the kind of visitation and snowmobile-driven economic stimulus that communities like Old Forge routinely experience. Additionally, the especially rugged character of Wilmington's landscape is not conducive to novice snowmobile riders, further limiting the connector trail's ability to serve as a destination-worthy snowmobile route on par with more popular routes in the Western Adirondacks. Certainly snowmobiling is a valued recreational opportunity in the community, and I'm happy that this particular opportunity exists, but we are very fortunate that the trail serves as more than just a snowmobile route. The trail on the East side of the mountain facilitates a significant amount of bicycle use (Poorman's Downhill) (By my own conservative estimates, Poorman's Downhill receives 10 times the number of user visits by bicycles as it does by snowmobiles, and has proven to be popular enough to attract visitors from outside the area, creating real economic benefits in the community). By use, Poorman's Downhill is primarily a bicycle trail that happens to allow snowmobiles, even though it has largely been developed as the opposite. This experience is instructive.

We are disappointed that the section of snowmobile trail from Cooper Kiln Pond to Bonnieview Road will not re-open. This is a little used trail as far as hiking and there are very few places left to snowmobile. Many locals accessed Cooper Kiln Pond from this direction.

With respect to snowmobile use of the Cooper Kiln trail supports preferred alternative 3C. A new trail can and should be designed primarily for ski touring and mountain bike use while still accommodating snowmobile use as is now permitted.

As for the Cooper Kiln trail reroute, I think it could be a good thing with input from a snowmobiler's perspective.

Impacts on hunting

After reviewing the proposed UMP for the Wilmington Wild Forest, I feel the additional trails being proposed for the Hardy Road parcel are not in the best interest of all users. Because this is a relatively small area in size, more trails would basically prevent anyone from hunting that area safely. The tract has already undergone too much change. Trails, signs and paved parking were all added for mountain bikers who pay nothing to the State, while hunters, who pay huge amounts in fees to the State, are being shut out of the area. This was one a handful of areas where a person could enjoy a little small game hunting with a good chance of seeing a grouse, woodcock or a

rabbit. The majority of State land is dominated by mature trees leaving no food or suitable cover for those species.

Response: *The additional trails proposed at the Hardy Road parcel will be a moderate increase in trail mileage, but they will have impacts on other users of the parcel. There are other locations nearby that are open for public hunting and that should offer hunting opportunities for grouse, woodcock, or rabbit. These locations include the State Land along Forestdale Road in the Town of Black Brook, the State Land between Bartlett Road and the Ausable River in the Town of Jay, and the conservation easement lands in the Town of Black Brook. Conservation easements in particular are conducive to good small game and deer hunting due to the habitat created by forest management.*

The mountain bike trails at Hardy Road are used by area residents and by visitors to the region. The economic activity created by use of the mountain bike trails is important to the area and generates tax revenue. None of the State resources spent on the construction or maintenance of the trails were collected from hunting license fees. Hunting license fees are used for the management of the hunting program. A hunting license does not give someone any additional rights to use State land over someone who does not have a hunting license. Wildlife Management Areas are funded by hunting license fees and federal taxes on firearms and ammunition, and are managed for wildlife related recreation such as hunting. The State Forest Preserve is funded by general tax revenue and is managed for multiple recreational uses.

I would like to comment on the UMP that is proposed for the Wilmington Wild Forest area. I would like to start by saying that I have been a lifelong resident of Wilmington and an avid deer hunter for the past 27 years. I have also been a mountain bike enthusiast for the past 5 years and have enjoyed many of the trails that are in the Wilmington area. Over this time, with the changing of the season from biking to hunting, I have witnessed some behavior from many of the mountain bikers, as well as hikers, that is negative to the hunters. I have been in the woods during evening watches when the deer are moving from bedding to feeding areas and I would suddenly hear the sound of a leaf blower. This has happened many times. Upon investigation I would find that it was people on "trail maintenance" for mountain biking.

Response: *The use of a leaf blower for trail maintenance could have a significant negative recreational experience for many users and degrade the wild forest character of the area. Leaf blowers will be prohibited from regular trail maintenance.*

There have also been many times that I have come across hikers, not from this area and many times not even from New York State, that would give me a look of disgust because I was walking out of the woods with a gun. Most recently, which has been from the deer season that has just ended, I was in the woods in the area behind the Wilderness Inn Restaurant. I have been hunting this area all season and I went in on a Sunday morning to find that a crew had put red ribbons about every ten feet directly through an area that I have been hunting all year long and has had high deer activity. This happened on or about November 21st which is very close to the peak mating

season. I assume that these markers are for one of the proposed trails that is in the UMP seeing how the ribbons are running from the Poor Man's Downhill area over towards the Ridge Trail. Tromping through the woods during prime hunting season to mark a new trail is simply inconsiderate.

This will be the second time that I will be driven from a hunting area because of a new trail being put in. The first was from Hardy Road which used to be a very good hunting area but now you cannot go into the woods over there without running into a biker or a hiker which is usually accompanied by a dog. My concern is this: When are we going to stop with these new trails and how is it that these trails, which definitely do have an effect on the land, are allowed to be made? A hunter is not allowed to trim a shooting lane or to use an ATV to access areas. Why is that bikers are allowed to put in these trails and have a negative effect on deer hunters who actually pay for the privilege to use the state land? With these new trails it simply increases the traffic, whether bike or foot, because people are no longer afraid of getting lost. I use trails that are there to access different mountain ranges but I am always off the beaten path and with these new trails being established, that is getting harder to do.

Response: *Trails do result in impacts to wildlife and other recreation users of the land. The UMP seeks to balance and mitigate the impacts from trail construction and use. Part of this balance includes keeping some areas trail-less.*

In closing I would like to state that I purchased a lifetime hunting license about 6 years ago and I do pay for this right to hunt the great land of the Adirondack Mountains. I have spoken to many deer hunters and every one of them feel the same way that I do about this situation. The comment I hear is that there is nothing we are going to do about it and writing this letter is a waste of my time. They are probably right as I know there are members of the APA as well as DEC that are mountain bike enthusiasts who participate in the Hardy Hour regularly but I still needed to voice my opinion as it is my money and the money of every other outdoor sportsman that is paying for these trail systems.

General

Planning for fat bikes: Between 2005 and 2012, Mountain biking was the fastest growing segment of recreational cycling. Since 2010, fat bikes are the fastest growing sub-segment of mountain biking, and their growing popularity requires a reconsideration of how to manage for winter cyclists sharing trails with other users. Although the thin and inconsistent snowpack of Wilmington's lower elevation trail network can be a hindrance for skiing and snowmobiling opportunities, it happens to benefit fat biking. The Wilmington Wild Forest plan amendment should recognize fat bikes as a welcome addition to the trail network and recognize locations where winter riding opportunities exist. Certain trails within the unit may not be open for summer cycling but could provide great opportunities for winter fat biking once the ground is frozen. The Snowmobile trail on the West side of the Stephenson range is the most notable example. Furthermore, certain trails that have historically been managed for ski touring in the winter months are

typically not covered with sufficient snowpack and may be more suitable for fat bikes. The Flume network and the Beaver Brook tract are typically low snowpack areas that are only marginally suitable for ski touring. Fat biking has the potential to further diversify and add recreational value to these trails without any significant risk of use conflicts.

Response: *A mention of fat biking has been added to the plan. The Department will need to provide opportunities for this recreational activity while being ready to respond to challenges that may be created.*

Black Brook Parcels: The Wilmington Wild Forest parcels along the Essex/Clinton county line could include a connecting trail between Bonnieview road and the Hamlet of Ausable Forks. Arrangements with private landowners may be necessary in the vicinity of Ausable Forks.

Response: *A trail in the Black Brook Parcels will not be included in the plan, but it may be studied for future revision of the plan.*

Recommend that DEC seek to open-up the state-owned land on Hamlin Mountain.

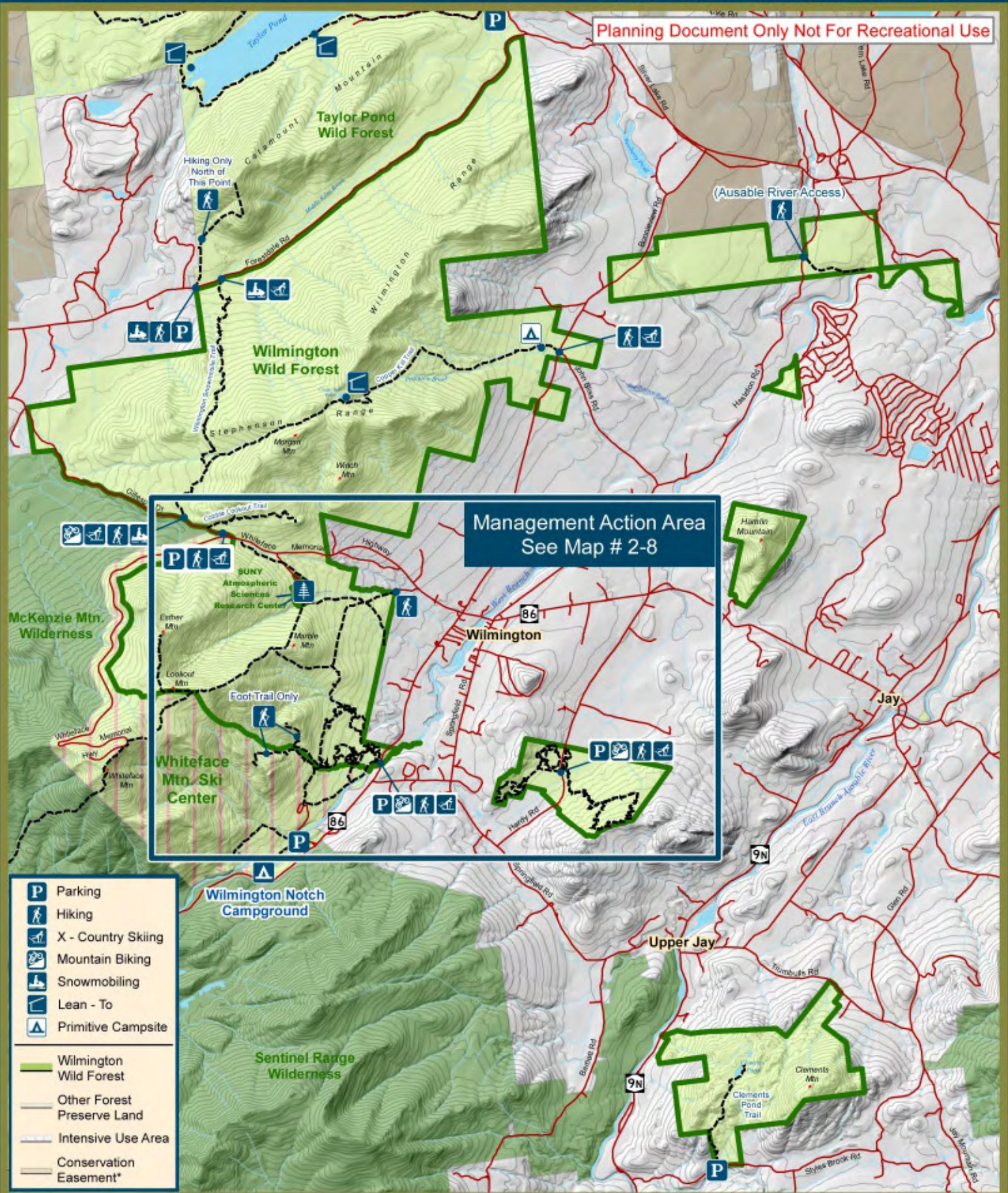
Response: *The state-owned lands on Hamlin Mountain are surrounded by private property. The Department would consider offers from willing sellers for access to Hamlin Mountain.*

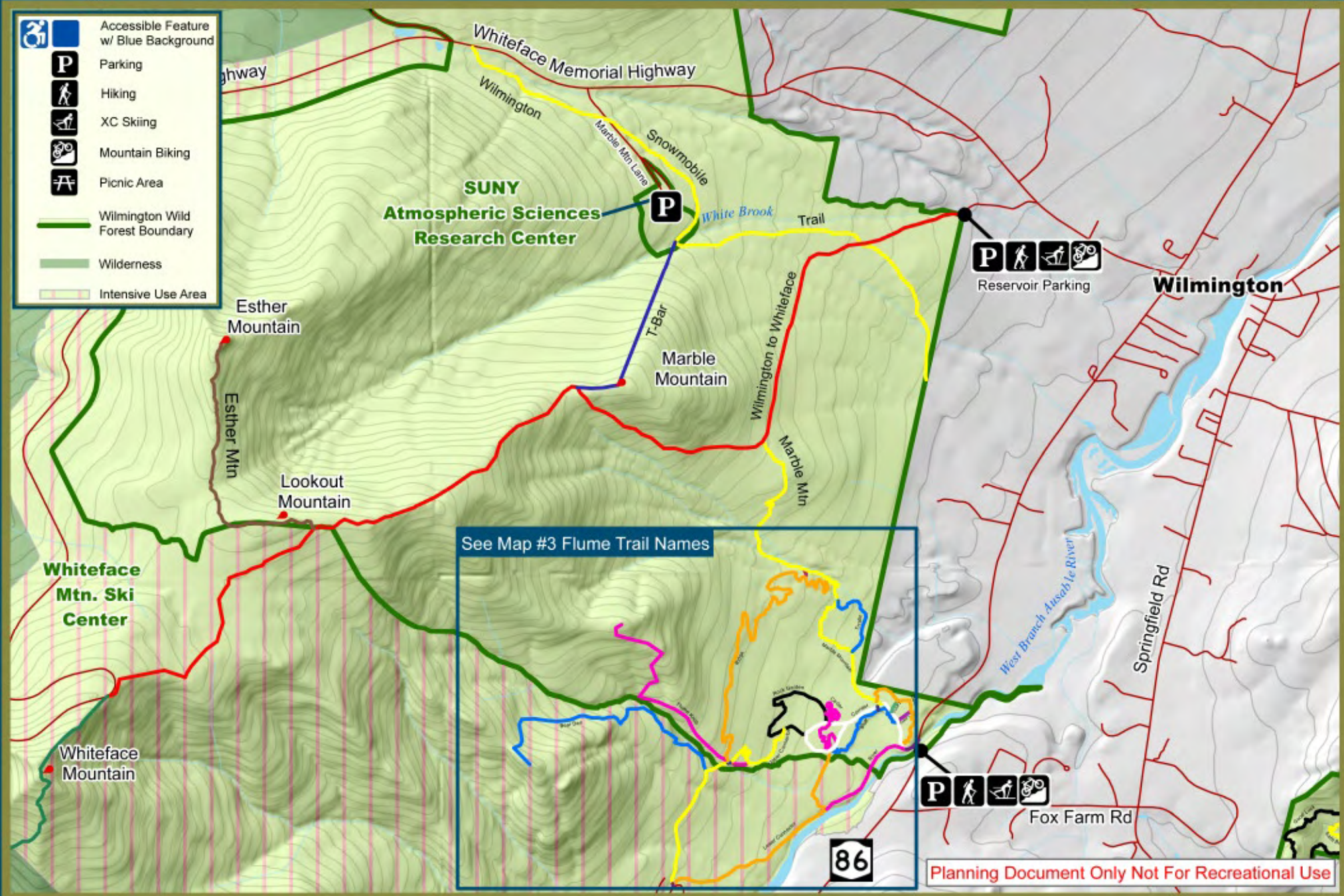
Maps

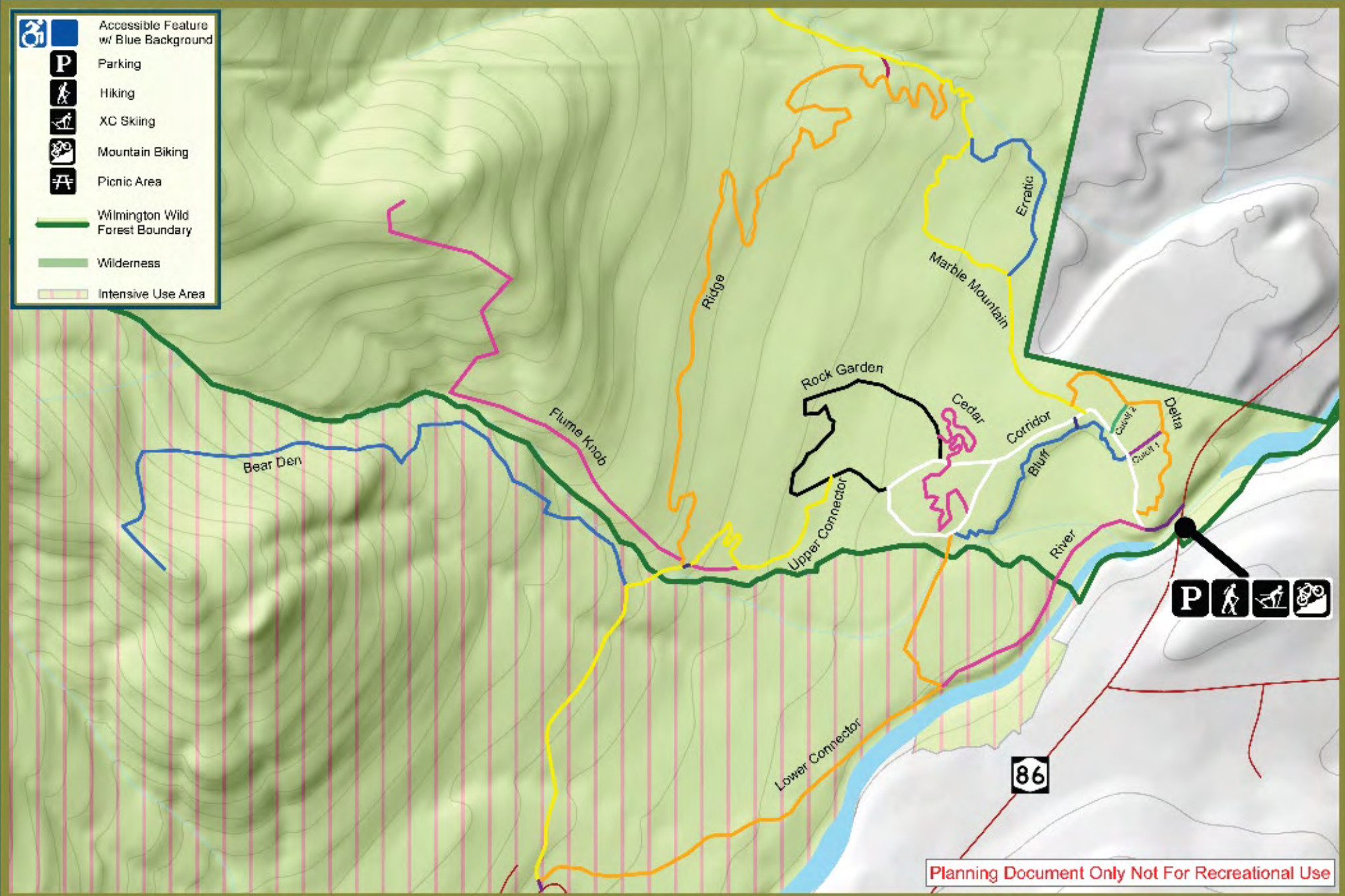
Map #1 UMP Existing Facilities Overview
Map #2 Flume Trail Names
Map #3 Flume Trail Names close up
Map #4 Proposed Actions Flume Trail Network
Map #5 After UMP Flume Trail Network
Map #6 Hardy Road Trail Names
Map #7 Proposed Actions Hardy Rd Network
Map #8 After UMP Hardy Rd Network
Map #9 Proposed Snowmobile Trail System
Map # 10 Cooper Kill Trail - Existing Trail
Map # 11 Cooper Kill Trail – Alternative 1
Map # 12 Cooper Kill Trail – Alternative 2
Map # 13 Cooper Kill Trail – Alternative 3A
Map # 14 Cooper Kill Trail - Alternative 3B
Map # 15 Cooper Kill Trail - Alternative 3C

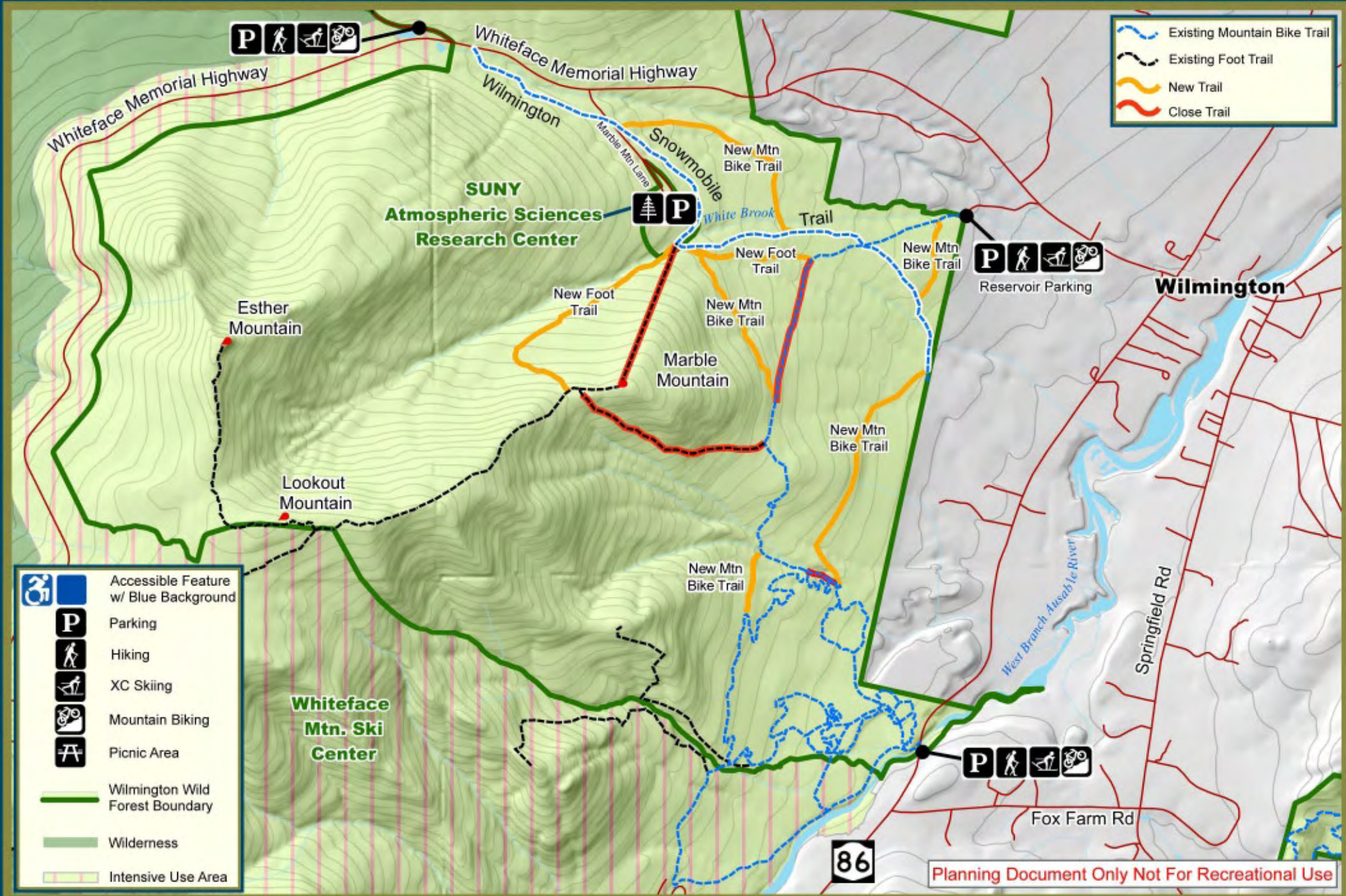
Wilmington Wild Forest

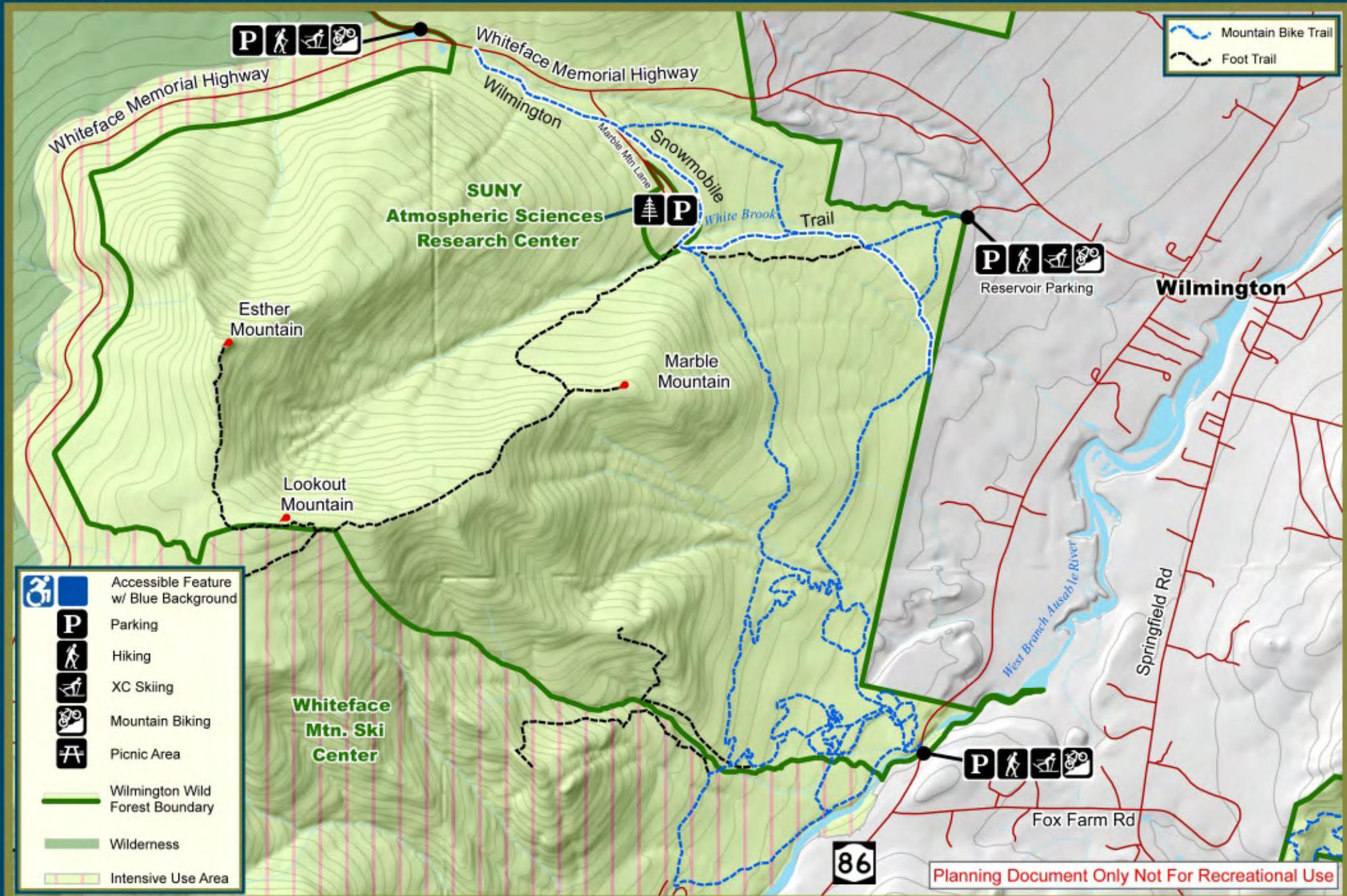
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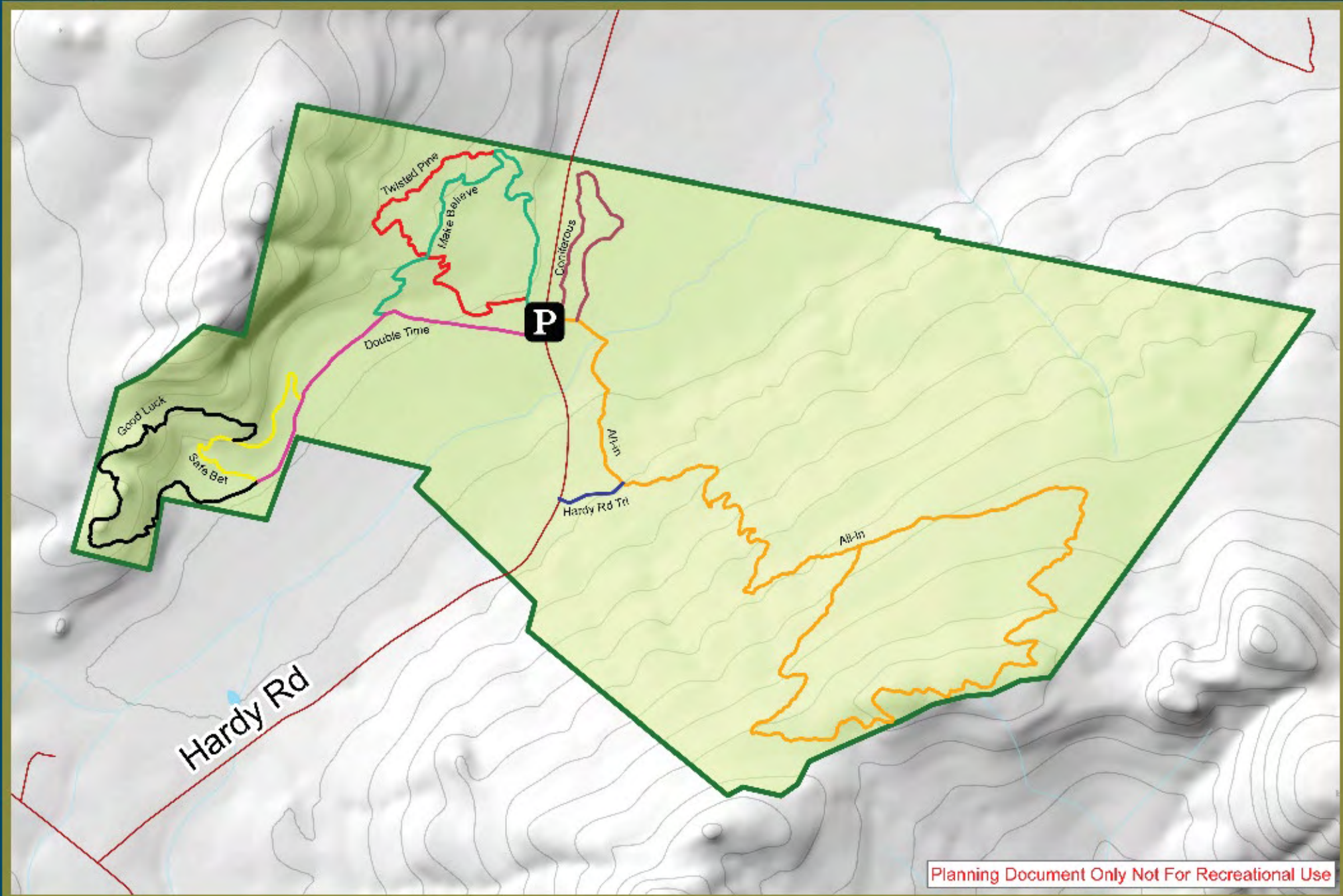


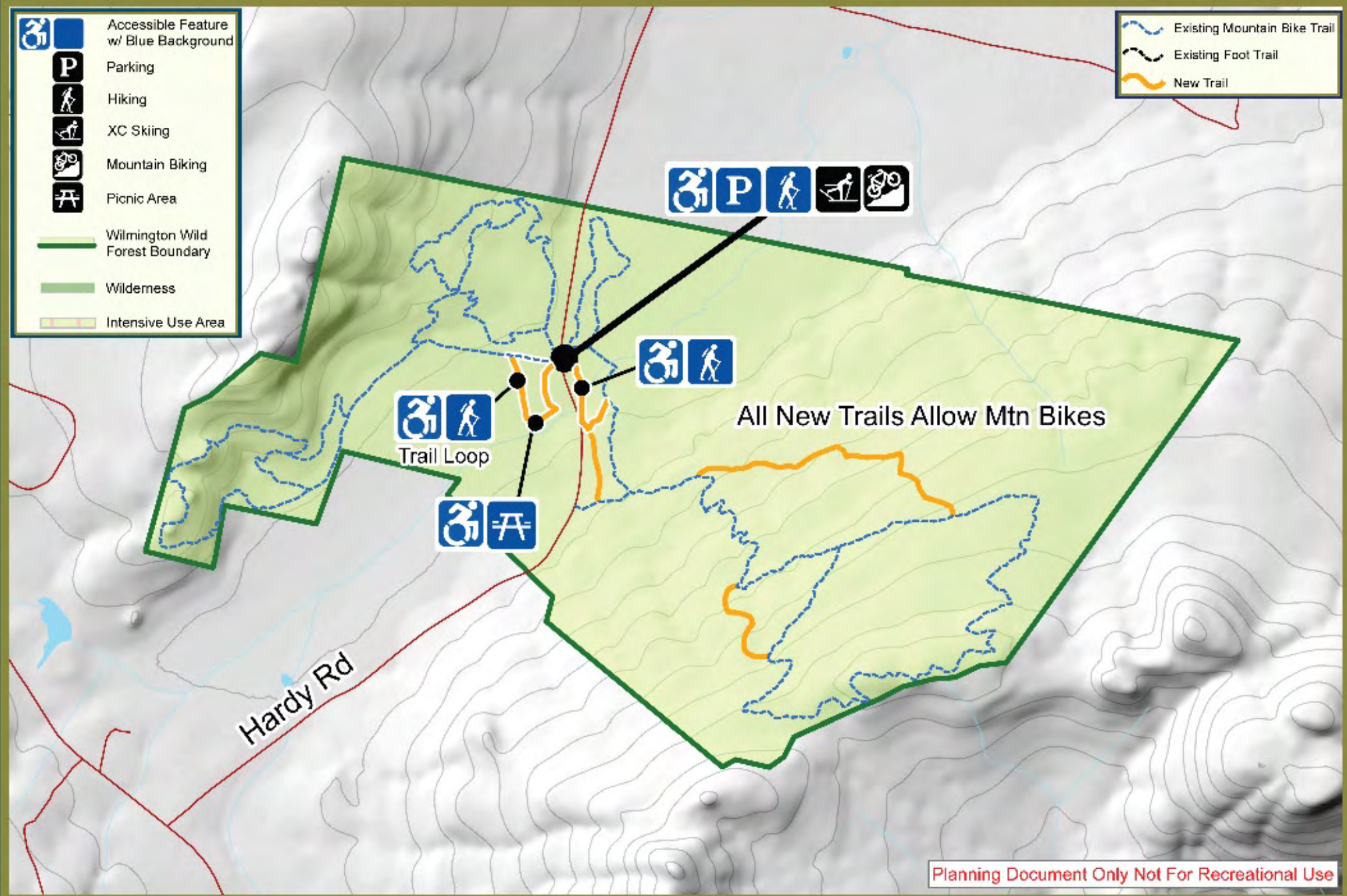


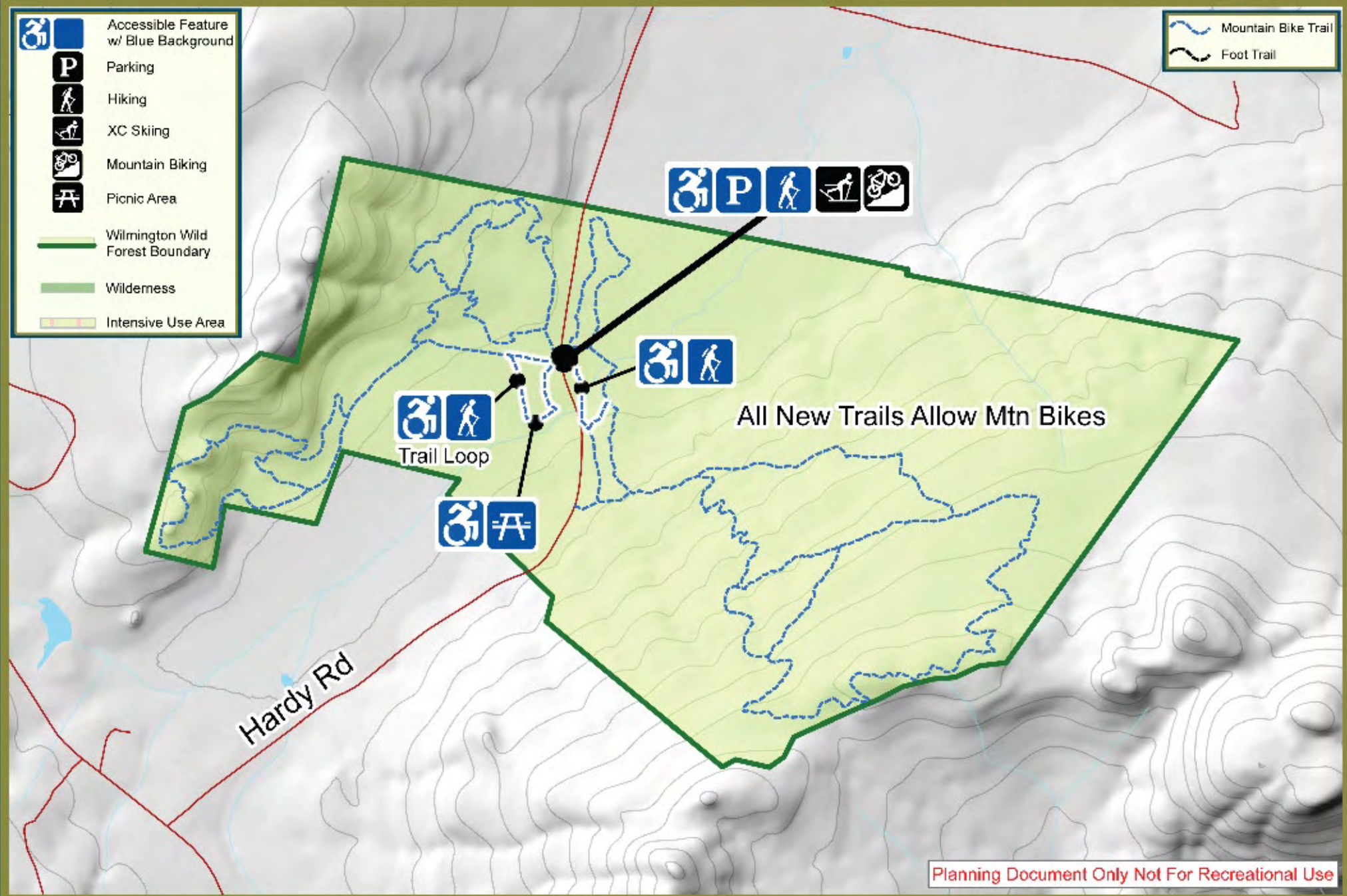




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Map # 9

