

From: Forrest Brownell <forrest@slic.com>  
Subject: Draft Stone Valley Cooperative Recreation Area Management Plan  
Date: February 7, 2014 at 1:29:31 PM EST  
To: John Omohundro <omohunjt@northnet.org>  
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Dr. John Omohundro  
Laurentian Chapter  
Adirondack Mountain Club

Dear John,

In commenting on the Draft Stone Valley Cooperative Recreation Area Management Plan, I'll limit my remarks to the proposed West Side Mountain Bike Trail, as described in Attachment 13 to the Draft Management Plan (Attachment 13 is hereinafter identified as "Project Description"), said attachment prepared by James Akins and submitted on December 17, 2013.

My comments address three areas in which the subject Project Description is either incomplete or misleading, namely:

- (1) The Statement of Need [absent from the Project Description, though §§15 and 16 ("Anticipated Impacts of Project on Management Goals," and "Management Objectives ... addressed by Project," respectively)] make several claims in indirect support of the proposed mountain bike trail,
- (2) The Trail Description [§6 ("Short Description")], and ...
- (3) Environmental impacts [§18 ("Anticipated impacts of project during and after construction on Natural Resources of the Area")].

Re: (1) Statement of Need

Northern St. Lawrence County already boasts networks of maintained mountain bike trails suited to all levels of ability. Trails can be found in Donnerville and High Flats State Forests, at Seven Springs, on the Clarkson University campus, and in the Stone Valley Cooperative Recreation Area itself (the O'Malley Brook Bike Trail referenced in the Draft SVCRA Management Plan). Mountain biking is also one of the intended uses of the evolving county-wide, multi-use trail system, and many more miles of mapped and maintained mountain bike trails lie within a couple of hours' driving distance of Canton and Potsdam.

That being the case, it is difficult to see how adding another mountain bike trail to the already extensive trail network in the Stone Valley Cooperative Recreation Area can be defended on either public interest or stewardship grounds, particularly in light of the multiple adverse impacts and loss of amenity values such construction and use would entail [see discussion of Environmental Impacts below].

As for the Management Goals and Objectives outlined in §§15 and 16 of the Project Description, all would appear to be ad hoc justifications. None of the listed goals and objectives is uniquely served by the construction of another mountain bike trail in the SVCRA, and every one could be more effectively addressed by other means.

#### Re: (2) Trail Description

Only a poor-quality map of the proposed trail accompanies the Draft SVCRA Management Plan, and no elevation profile is attached, so it is impossible to determine if the "Short description" in §6 ("A 3.1 mile of [sic] narrow beginner and intermediate mountain bike trail ... [consisting of] new single track [and] designed to be ridden in either direction") is accurate in ANY particular. This much, however, can be said: Given the necessity, as outlined in the Project Description, for "easier alternate routes to allow for riders of various ability levels" and the stated design objective ("twist-and-turn"), the cumulative length of the resulting multiple trail corridors is certain to exceed the nominal length by a significant amount.

Furthermore, the trail width is misleadingly described as "narrow" (and elsewhere as "mostly two-foot width"). If this were an accurate description of the planned trail, it would preclude its use by beginners, notwithstanding the claims to the contrary made in §6 ("Short description"). International Mountain Bike Association guidelines stipulate a MINIMUM tread width of 36 inches for the Easy ("Green Circle") Trails designed to accommodate beginning riders. A trail with a tread width of only 24 inches would be properly classed as a "More Difficult (Blue Square) Trail," best suited to experienced riders with at least a "moderate level of skill and fitness." It is NOT a "beginner trail."

Nor is this the only point at which the Project Description misleads as to the extent of the proposed construction-associated disturbance. The document fails to distinguish between tread width (the stipulated 36-inch-wide "traveled way" of a Green Circle trail, this is also the minimum depth of a typical bench cut) and the significantly greater corridor width (the area to be cleared of most trees, any overhanging branches, large rocks, and other hazards.) The land surface on either side of the tread within the corridor is also subject to backslope contouring and downslope spoil dumping. Creating a trail suited to both beginning and intermediate riders would therefore entail clearing and recontouring ("blending") a CORRIDOR some 7 or 8 feet wide, as well as removing any encroaching tree limbs or overhanging vegetation to a height of 8 feet or more.

A final point: Since the trail must accommodate two-way traffic, safety and liability considerations would dictate adding extra width in critical areas such as curves and

descents, in order to improve sightline distances and reduce the probability of collision. This would further increase the corridor width in these locations.

The bottom line? At MINIMUM, construction of the proposed beginner-intermediate mountain bike trail will entail physical alteration of 2.6 acres, while the actual acreage to be excavated, "blended," or cleared will in all likelihood be greater. This brings the proposed West Side Mountain Bike Trail within the scope of 6 NYCRR 617.4(b)(10), viz., "any Unlisted action, that exceeds 25 percent of any threshold in this section, occurring wholly or partially within ... any publicly owned or operated ... recreation area," and consequently mandates its classification as a Type I action, subject to all the requirements of the State Environmental Quality Review Act.

In this connection, I believe that New York State Conservation Council Specialist Walt Paul, speaking before a public meeting in Colton, New York, on February 3, 2014, voiced his (and the Conservation Council's) concern over the pace and scope of recreational development in the Stone Valley Cooperative Recreation Area, noting that it was "significant enough to warrant a GEIS." He then concluded his remarks by adding, "Sometimes land gets loved to death."

Mr. Paul and I are of one mind in this matter.

Re: (3) Environmental Impacts

The Project Description's treatment of the environmental impacts attendant on the construction of the proposed West Side Mountain Bike Trail, as embodied in §18 ("Anticipated Impacts of Project"), is perfunctory at best, dwelling almost entirely on engineering and design aspects of construction. The sole mention of other matters is an assertion that "the trail will be kept to its mostly two-foot width and unplanned trails removed." But the first part of this claim has already been shown to be grossly misleading, ignoring as it does both the minimum 36-inch tread required of a beginner's trail AND the impacts attendant on clearing and contouring operations in the 7- or 8-foot-wide trail corridor. (The rehabilitation of existing "unplanned" trails is in no way contingent on the construction of yet another trail, of course, and it would make a good project for any interested group.)

Of even greater concern, however, is the failure of the Project Description to address any of the adverse effects of trail construction and its subsequent round-the-clock use (mountain biking is NOT confined to daylight hours) on:

(a) Breeding bird populations (the deeply incised terrace which the proposed trail follows is home to many woodland warblers and a number of ground-nesting birds, including veery and hermit thrush),

(b) Fisher and black bear (both are known to frequent the area in question),

(c) Whitetail deer (the proposed trail traverses a number of critical wintering yards, and though winter use of the trail by mountain bikers will be limited to "fat bike" enthusiasts who ride machines like the Surly Pugsley, the cleared corridor is certain to attract many skiers, snowshoers, and dog-walkers), and ...

(d) The vibrant extant community of woodland wildflowers now carpeting the forest floor along the terrace (e.g., spring beauty, wild oats, marsh marigold, trout lily, trilliums, Jack-in-the-pulpit, and pink lady's slipper orchid), not to mention the extensive fern "gardens" in the many swales.

And that short list is far from complete. In truth, an accurate determination of the probable adverse impacts of the construction and subsequent use of the proposed West Side Mountain Bike Trail on this diverse and productive woodland environment would require that a comprehensive inventory of local species first be prepared; their distribution, nesting, and denning areas be mapped; and the stability and character of local soils be determined by field testing at a number of sites along the corridor. To my knowledge, none of these things has been done, and until that lapse has been remedied, no meaningful assessment of this project's environmental impact can be made. The permitting application embodied in Attachment 13 is therefore premature. It has no place in the Draft Management Plan for the Stone Valley Cooperative Recreation Area.

Sincerely yours,

Forrest Brownell  
Colton, New York

cc: Mr. James Akins (St. Lawrence County Mountain Bike Association)  
Mr. Dan Doust (Brookfield Renewable Energy)  
Mr. Matt Johnson (Brookfield Renewable Energy)  
Mr. Richard McDonald (NYS DEC, Raquette River Advisory Council)  
Mr. Walt Paul (New York State Conservation Council)