



United States Department of the Interior

NATIONAL PARK SERVICE

Ice Age & North Country
National Scenic Trails
700 Rayovac Drive
Madison, Wisconsin 53711-2468

IN REPLY REFER TO:
L6017(NOCO-NY)

January 4, 2008

Mr. Peter Frank, Division Chief
NYS Department of Environmental Conservation
Division of Forest Preserve Management
625 Broadway
Albany NY 12233-4254

Dear Mr. Frank:

We are very appreciative of the efforts of the Department of Environmental Conservation (DEC), working closely with the North Country Trail Association (NCTA) and this office, to propose a route for the North Country National Scenic Trail (NST) across Adirondack Park. This is an important step in fulfilling the intent of National Scenic Trails—to route the trail to and through “nationally significant scenic, historic, natural, or cultural ... areas.” Adirondack Park is certainly nationally significant in terms of these qualities.

We also appreciate the opportunity to comment on the Draft Adirondack Park Trail Plan. We support the route proposed in the plan, but would like to offer a number of suggestions that we believe will strengthen the plan and improve its value as a working document.

Perhaps the most significant change we would suggest is to revise the presentation of mileage figures in order to clearly communicate the fact that the Temporary Connector miles will need to be replaced with additional new miles of trail. The plan states that roughly 47 miles of “New Trail” will need to be built, along with 70 miles of “Existing Trail” and 27 miles of “Temporary Connector,” implying that roughly two-thirds of the trail is complete. We are concerned that this leaves the public with the expectation that the trail will involve less trail building than it truly requires. In fact, only about half of the route exists, including unsustainable “herd paths.” Perhaps the following table will help to clarify our point:

Category	Current Miles in the Proposed Route	Miles of New Trail Required
Existing Trail (including herd paths)	70	
Temporary Connector	27	27
Proposed routes for New Trail	47	47
TOTALS	144	74

We acknowledge that, from the perspective of developing a usable trail across Adirondack Park, using the Temporary Connectors will allow through-hiking to begin sooner. However, until the trail is located off motorized routes it cannot be considered finished.

Many of the miles of “Temporary Connector” are along narrow, winding roads that pose a degree of danger to pedestrians walking on them. In many areas, there are currently no public lands outside these road rights-of-way. In many ways, these connectors should be considered a priority for replacement with new trail, yet we understand that the acquisition of lands or easements in order to relocate the trail will take significant time and resources. Concurrently, efforts can be undertaken to construct new trail where no hike-able route exists and to upgrade existing trails to modern sustainable standards.

Subsequent to the approval and adoption of the final plan for the trail, we believe a Memorandum of Understanding should be established between the NPS and DEC, and perhaps other parties, laying out our respective roles and responsibilities for the trail within Adirondack Park. The NPS will take the lead in preparing a discussion draft and will forward it to you. In advance of that draft, we would like to share a few of the important items that we believe the agreement should address:

1. Acquisition of lands or easements for the trail within Adirondack Park will be the prerogative of New York State agencies. Federal agencies, including the NPS, presently have no authority to spend funds to acquire lands for the trail outside existing Federal areas (except for lands for one interpretive site along the trail in each state through which the trail passes). Even if the NPS should eventually be authorized to acquire lands for the trail from willing sellers, the NPS does not foresee any circumstances where it would be appropriate for it to be acquiring lands within Adirondack Park. Should Congress in the future provide grant funding to enable the NPS to assist New York State in acquiring lands for the trail, as it has in the state of Wisconsin, the NPS will gladly grant those funds to enable the state to secure lands for the trail from willing sellers.
2. The NPS has overall administrative authority for the North Country NST. Nevertheless, the DEC retains all responsibility for management of the trail and the lands that it traverses. In addition to its own regulations, rules, and policies, the DEC will be guided by pertinent provisions of the National Trails System Act, the policies in the North Country NST “Comprehensive Plan for Management and Use,” and the guidelines in the “North Country National Scenic Trail Handbook for Trail Design, Construction, and Maintenance.”
3. The North Country NST comprehensive plan provides for a flexible approach to marking and signing the trail, requiring only that the official trail emblem is used on NPS-certified segments. While the Handbook presents a more standardized approach to marking and signing and the NPS has committed to providing that array of signs for the trail, the flexible policy in the comprehensive plan is still in force. The DEC is responsible for determining how the trail will be signed in accordance with its standards and management designations. If the DEC decides to sign the trail differently than the Handbook standards, the NPS is not necessarily committed to providing such signing.
4. Where there is a collective decision to utilize an existing shared-use trail as part of the route of the North Country NST across Adirondack Park, the NPS will accept the existing authorized uses of the trail, even if that means the NPS is unable to certify it as an official segment. The NPS will not request or advocate the displacement of any authorized existing use(s) from any existing shared-use trails that are incorporated into the route on a temporary or permanent basis. The NPS will encourage the DEC and its local partners to work toward establishing a certifiable, hiking-only replacement segment over the long term.
5. The North Country NST is compatible with a wide range of landscapes and land uses, from pristine wilderness to agricultural lands, managed forests, and urban areas. The provisions of the National Trails System Act state: “That in selecting the rights-of-way [trail route] full consideration shall be given to minimizing the adverse effects upon the adjacent landowner or user and his operation. Development and management of each segment of the National Trails

System shall be designed to harmonize with and complement any established multiple-use plans for the specific area in order to insure continued maximum benefits from the land.”

The NPS is grateful for the partnership that is developing to establish the North Country Trail in Adirondack Park. We commend the DEC and the NCTA for their trail planning efforts and look forward to growing this important initiative for the people of New York State as well as the entire hiking community. If you have any questions about our comments, do not hesitate to contact me or our North Country NST staff.

Sincerely,

/s/ Thomas L. Gilbert

Thomas L. Gilbert
Superintendent

Cc: North Country Trail Association