



October 12, 2022

Basil Seggos, Commissioner
New York State Department of Environmental Conservation (NYSDEC)
625 Broadway
Albany, NY 12233-4254

RE: Visitor Use Management Plan for Catskill High Peaks without Formal Trails

Via email to: CatskillPark@dec.ny.gov

Dear Commissioner Seggos:

For 53 years, the Catskill Center for Conservation and Development has worked to protect and foster the environmental, cultural, and economic well-being of the Catskill Region, serving portions of Delaware, Greene, Orange, Otsego, Ulster, Sullivan, Schoharie, and Albany Counties. While we have been pleased to see greater interest in outdoor recreation in the Catskills in the past few years, we also recognize that dramatically increased use can lead to considerably increased harm to natural resources, as DEC monitoring data have unfortunately demonstrated. The Catskill Center commends DEC for assessing the impacts of frequent visitation to those Catskill High Peaks that lack formal trail systems and for initiating a planning process to address those impacts. We appreciate the opportunity to submit comments for DEC's consideration.

DEC has indicated that three primary strategies are currently under consideration:

- Decreasing use of informal trails that are damaging rare, threatened, and endangered species;
- Identification of "preferred" informal trails for each summit that create the least damage; and
- The creation of formal trails that are designed to accommodate long-term use while preventing further damage to natural resources.

The Catskill Center supports DEC's proposed strategies and would urge additional and even stronger action by the agency. Visitation is unlikely to decrease in the foreseeable future. An overabundance of entrenched informal trails can lead to soil compaction, erosion, forest

fragmentation, and introduction of invasive species into interior forest habitats. **In our view, the ultimate solution is to establish well-designed, marked, and maintained trails to each Catskills High Peak.** Limiting pedestrian traffic to formal trail routes is essential for long-term protection of the Forest Preserve as wild forest land. Since this fundamental solution will take time to implement, we suggest that DEC take the following actions in the near term:

Immediate

1. Sensitive Habitat Protection. Move quickly to identify locations with known or probable occurrences of rare, threatened, or endangered species or natural communities and physically prevent trampling in those areas while simultaneously providing a preferred alternate route. DEC must take steps in the immediate future to prevent further degradation of the most sensitive habitats.

Short-Term

1. Identify Preferred Informal Trails. Expeditiously identify a preferred informal trail route for each trailless High Peak, using desktop resources such as slope, Natural Heritage data, etc. If all of the existing informal trails on a given peak are likely to significantly degrade resources, DEC should create and temporarily mark/flag a suitable informal route. The selected informal routes may not be ideal, but they will likely safeguard resources far better than completely unplanned, uncoordinated public access.
2. Short Term Education and Outreach. Use all readily available communications channels, including social media, partner organizations, the Catskills Visitor Center, temporary signs at informal trailheads, etc., to rapidly and widely share interim trail route recommendations.
3. Triage by Peak. Rapidly complete a desktop prioritization of the trailless High Peaks in most urgent need of attention, drawing upon a combination of STRAVA heat map data, slope, Natural Heritage data, and other relevant sources, so that problems can be addressed in the order of threat to natural resources. This desktop prioritization can be supplemented and refined later in response to data from the field, but DEC should not postpone an initial prioritization while waiting on further data or public input.
4. Plan for Formal Trails to Each Summit. Drawing upon the initial triage of peaks, DEC should map out a schedule for the design and construction of appropriate trails for each High Peak, to be implemented over the next few years, in priority order.

Long-Term

1. Design and Construction of Trails. Implement the plan for designing and constructing resource-appropriate trails to each High Peak over time, in priority order.
2. Long-Term Education and Outreach. Collaborate with partners to develop and implement an education and outreach campaign to accompany the development of formal trails for each peak, emphasizing Leave No Trace principles. DEC should build

upon its existing investments in the Catskills Visitor Center and Catskills Steward Program to educate the public as they plan their visits, and at each peak.

3. Ongoing Monitoring and Analysis. Ongoing collection and analysis of both field and digital data is imperative for effective protection of the entire Forest Preserve, at the High Peaks and beyond.

Thank you for considering the Catskill Center's suggestions to safeguard the Forest Preserve. We are confident that the Catskills High Peaks will be best protected through a new network of official trails, plus interim actions to abate the most urgent threats. We are glad that there is increasing appreciation of and interest in the Catskill Mountains, but as visitation patterns have dramatically and rapidly changed, so has the corresponding impact of that recreation. We, as collective stewards, must respond to those changing circumstances, and we applaud DEC for initiating that process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeff P. Senterman", followed by a long horizontal line extending to the right.

Jeff Senterman
Executive Director