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January 8, 2015

Mr. Josh Borst, Senior Forester
NYS Department of Environmental Conservation
65561 State Highway 10, Suite 1
Stamford, NY 12167

Via email at R4.UMP@dec.ny.gov

RE: Comments on Proposed Update to the Kaaterskill Wild Forest Unit Management Plan in the Vicinity of Kaaterskill Falls

Dear Mr. Borst:

The New York-New Jersey Trail Conference partners with parks and recruits volunteers to create, protect, and promote over 1,000 miles of public trails in New York, including many trails and lean-tos of the Catskill Park. As part of our mission in the Catskill Mountains region, we support local economic development by working to make public lands more accessible and appealing, and to engage local residents in the stewardship of trails and public lands. We work closely with volunteers, state and local agencies, and communities to enhance and promote recreational trails and access to public lands in the region, and to advocate for the Catskill Park and Catskill Mountains region. In addition, we produce maps and guides for trails in the Catskill Mountains region.

We wanted to thank you for your continued interest in the access, safety, and natural resource protection issues in the area surrounding Kaaterskill Falls. This iconic feature is one of the most visited sites in the Catskill Park and is a key to bringing visitors to the mountaintop area for local communities. The development of a Draft Unit Management Plan (UMP) for the area will be a welcome start to this process and we look forward to working with the DEC on the implementation of the approved plan.

To help guide your development of a Draft Unit Management Plan Update for the Kaaterskill Wild Forest area around Kaaterskill Falls, we offer the following comments and recommendations:

1. In the broadest sense possible, the Trail Conference recommends a comprehensive and collaborative approach to managing public access at Kaaterskill Falls, with the goals being to increase safety and access while protecting and improving this unique and popular natural resource in the Catskill Park. We believe that the best method for this comprehensive approach is to address the issues of Kaaterskill Falls and vicinity in the development of a Catskill Park-wide recreation plan. This type of plan would allow for both local and regional solutions to issues such as access, safety, trail development, and natural resource protection.
2. All solutions will require the cooperation of a number of agencies, local communities, and organizations, including the Town of Hunter, the DEC, DOT, nearby landowners, non-profit organizations like the Trail Conference, and local businesses. Extra effort should be made in the Draft UMP to address issues related to communication and collaboration.



3. With regards to improvements and changes surrounding Kaaterskill Falls, the Trail Conference supports:
 - Redevelopment and relocation of the current Kaaterskill Falls Trail to create a safer and more environmentally sustainable means of public access to the base of Kaaterskill Falls. Given the popularity of this trail, conservatively measured at several hundred people a day by the DEC Resource Steward in October of 2014, this trail must be constructed to a higher standard than the typical backcountry trail found in the majority of the Catskill Park and Forest Preserve. For this trail, the Trail Conference would recommend using natural materials and low-impact construction methods. An example of this construction would be on the Appalachian Trail between the Bear Mountain Inn and the summit of Bear Mountain, where the trail has been designed to take advantage of the mountain's topography and mostly native materials have been used to support the thousands of hikers a day the trail receives;
 - The development of a new trail that connects the existing Escarpment Trail and the Kaaterskill Falls Trail in a safe and efficient manner. For a connector trail between the Kaaterskill Falls Trail and the Escarpment Trail, we would suggest a trail connection that brings hikers from the Kaaterskill Falls area to Layman's Monument on the Escarpment Trail.

A trail laid out between these two points would allow for the design and construction of a trail that was more enjoyable to hike and would ultimately be safer, sustainable, and more environmentally friendly. It would also draw visitors away from the upper, more dangerous areas of Kaaterskill Falls, and in conjunction with the Escarpment Trail and the Kaaterskill Rail Trail, would allow hikers to enjoy multiple vistas of Kaaterskill Falls and Kaaterskill Clove, access the North and South Lake Day Use Area, and utilize any potential future shuttle service;

- Investigating the feasibility of developing a new trail from the area of Layman's Monument that travels back down to Route 23A in the vicinity of the lower Kaaterskill Falls parking area. This would allow hikers to complete a loop, hiking into the Falls, traveling to the Escarpment Trail and its vistas and then back down to Route 23A without the need for shuttle service or multiple vehicles;
- Careful consideration and review of the value of developing a new trail that would bring visitors to the upper level of Kaaterskill Falls from the Kaaterskill Falls Trail's current end. The trail's current end, before the base of the lower falls, provides the public with a safe viewing area of Kaaterskill Falls. Site conditions beyond this point would make the construction of a safe, sustainable, and environmentally friendly trail from this location to the upper falls difficult.

While a popular area to visit, the area at the base of the upper falls is geologically unstable, with ice and rock falls a common occurrence. In addition, for a trail behind the Falls, there is the danger of a catastrophic rock collapse from the overhanging amphitheater roof. There would need to be a detailed study of the safety hazards and stability of the area before a trail should be considered;

- Careful consideration and review of the value of developing a short, steep connector trail between the top of the falls and the end of the existing Kaaterskill Falls Trail. If other trails providing access to the Escarpment Trail and the Kaaterskill Rail Trail are constructed, there may not be a need for this trail, which



would require a significant level of construction and may focus too much use on a single area;

- Completion of the Kaaterskill Rail Trail (KRT) near the top of the Kaaterskill Falls through the construction of a pedestrian bridge over Lake Creek, which will provide a safe crossing for visitors above Kaaterskill Falls and facilitate hiker traffic along the KRT, the Escarpment Trail, and any future Escarpment/Kaaterskill Falls Trails connections;
- Using the extended Kaaterskill Rail Trail and reworking the existing unmarked trails at the top of Kaaterskill Falls to create a small interpretive trail network that brings visitors to the proposed viewing platform/area.

With regards to the viewing platform, we have concerns regarding the appearance of this structure and its construction. We feel whatever is constructed should be within the Forever Wild designation of the Forest Preserve in this area and should be constructed with natural materials to the greatest extent possible and not be highly visible from other areas;

- Working with the DEC and partners to deploy Trail Conference and Catskill Conservation Corps stewards in the area. We envision a combination of paid and volunteer trail and resource stewards in the area to educate visitors, help protect natural resources, and help to ensure the safety of hikers and visitors. Paid stewards require identifying funding sources; and
 - Working to ensure that the DEC has more resources to increase public education and patrols in the area by Forest Rangers, Assistant Forest Rangers, and Student Conservation Corps Backcountry Stewards
4. While outside the direct control of the DEC and the scope of the Draft UMP update, the Trail Conference supports:
 - The creation of a weekend shuttle service between Palenville and Hunter to reduce parking pressure in the clove, move visitors into the villages, and provide an outlet for public information about areas to visit, including Kaaterskill Falls; and
 - Improvements to pedestrian safety along Route 23A;
 5. We urge the DEC to work with groups like the Trail Conference, the Town of Hunter, and the Mountain Cloves Scenic Byway to develop interpretive and educational information for visitors to the Kaaterskill Falls area. In 2014 the Trail Conference launched a map and guide, available in print and for mobile devices, to better educate and guide visitors to the Falls. We are interested in expanding these resources.
 6. Visitors come from a large geographic area with a wide variety of skill sets, outdoor knowledge, and abilities. Many have little to no backcountry experience. It is incumbent upon all involved in the management, promotion, and maintenance of this area to do our best to educate visitors to avoid natural resource degradation, personal injuries, and deaths. These visitors also represent economic potential for the mountaintop communities, and by incorporating these communities in the planning, especially at a regional level, we can help drive economic development in the area.



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7. As we stated during the public scoping session, one of the most important aspects of this planning process is to ensure that the DEC has the fiscal and manpower resources to implement the recommendations made in the final UMP update. The Trail Conference will continue to work with partners in the region, including the Catskill Park Coalition, and on our own to advocate for the necessary resources for the proper maintenance and management of the Catskill Park.

Thank you again for the opportunity to comment. We look forward to the issuance of the Draft UMP this spring and working with you to take on the challenges of Kaaterskill Falls and the surrounding area. If you have any questions or concerns, please feel free to call me at 518-628-4243 or email me at jsenterman@nynjtc.org.

Sincerely yours,

Jeffrey Senterman
Senior Program Coordinator

cc: Assemblymen Peter Lopez
Senator George Amedore