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Looking first to the Master Plan, it is clear that backcountry skiing fits squarely within the conforming recreational uses of this wild forest. The Master Plan states that ski touring and other forms of primitive and unconfined recreation are “compatible with wilderness [and therefore wild forest] and should be encouraged as long as the degree and intensity of such use does not endanger the wilderness resource itself.” Since backcountry skiing is essentially ski touring through an unconfined area of mature forest, it is undisputed that this use on Lyon Mountain is conforming and should be recognized and hopefully encouraged.

Unfortunately, there is no recognition or definition in the state land use master plan or any of the unit management plans for the management of backcountry skiing, “glade zones”, or “skin tracks”. This regulatory vacuum should be addressed through this UMP. If we don’t define this use, and establish appropriate management tools, we will have wasted an economic opportunity; ignored safety issues due to the multi-use of the trails; prevented the ability to appropriately manage “glade zones”; and suppressed a desirable human-powered recreational sport which has minimal adverse environmental impacts. The APSA is confident that our activities promote a healthy lifestyle and foster a true wilderness experience. Since backcountry skiing is human powered and occurs on top of a snow base in the confines of a mature forest, there are minimal issues with respect to disturbance of vegetation or trail erosion. In fact, it is our understanding that the establishment of glade zones has improved suitable habitat for threatened species such as the Bicknell’s Thrush and the Spruce Grouse. In addition, due to the absence of regulations or definitions for backcountry skiing, as well as the inability to manage these glade zones, there is likely going to be an overly concentrated use of the diminishing backcountry ski opportunities on Lyon Mountain. The State’s continued commitment to increasing the lands within the Forest Preserves, without an ability by the public to fully avail itself of these backcountry skiing opportunities, must be corrected.

The APSA seeks the opportunity to fill the current regulatory vacuum and we will work with the DEC, APA and all other stakeholders to create a state-wide definition of “glade zones” “skin tracks” and “ski trails” to be applied to this, and other, unit management plans. Either through an amendment to the State Land Master Plan, or via another regulatory route, these definitions will rely on and apply sound forestry practices with APA and DEC guidance in order to maintain the resource while preserving and improving this wild forest. At a minimum, the APSA seeks to have this UMP recognize, manage and preserve the skin tracks, ski trails and glade zones that currently exists on Lyon Mountain. In the future, this UMP should also provide for the development of additional backcountry ski opportunities. A token “trail” or two—with the same dimensions of a “foot path”—will not suffice, will exacerbate the concentration of skiers and grossly under-represents the historic and current backcountry ski use of this mountain. Therefore, along with our comments, we request additional meetings with the