



Forest Fire Lookout Association – New York Chapter

Laurie Rankin, Director

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Jeff Rider, Supervising Forester  
NYSDEC  
21 South Putt Corners Road  
New Paltz, NY

Dear Jeff:

Thank you for the opportunity to provide comments regarding the Draft Overlook Mountain Wild Forest UMP. One of the The Forest Fire Lookout Association's (FFLA) members is the Catskill Fire Tower Project that includes the Overlook Mountain Fire Tower. The Overlook Mountain Fire Tower is listed on the National Historic Lookout Register as NY-17. As such, the FFLA has a vested interest in maintaining not only the historic fire tower and cabin, but also the environment that surrounds them.

While the FFLA gladly supports the CP-3 access program, we have strong concerns about that designation at Overlook Mountain. Utilizing your own figures of possible usage of the trail by 63,000 visitors per year, the addition of motor vehicle access via permit (CP-3) is a poor decision. According to the current 1999 UMP the “Departments position is not to maintain the road to the higher standard which is needed for the radio/TV tower, but rather to maintain the road to the minimal condition needed to maintain the fire tower and Observer's cabin.” Persons who are issued a permit to visit the fire tower under the draft proposal will find themselves driving a long, steep, and rocky road that is not maintained to highway standards through a crowd of pedestrian visitors. The proposed CP-3 designation to allow motorized public access raises many safety concerns regarding motor vehicle use in the same space as that heavy foot traffic, particularly on steep inclines over the 2.4 mile length of the shared trail/roadway. It also raises significant public safety concerns should a vehicle skid off the road blocking any needed emergency response higher on the mountain. Improved maintenance would only increase the speed of motorized vehicles on the roadway and add to the dangers mentioned above.

The addition of this motorized access does not address the impacts on the threatened timber rattlesnake population that are known to exist on the mountain. Persons in motor vehicles will cause the hikers to move to the edges of the roadway and summit clearing and enter the prime habitat area of the timber rattlesnake. These edge habitats are where their major food source, chipmunks are. An intrusion by the visiting public in these areas has not been addressed in the UMP. In addition, the timber rattlesnakes while visible by hikers on foot, would be much more difficult to see from a motor vehicle. Vehicles that were to access the summit in lower light conditions would be very unlikely to see the timber rattlesnakes. The timber rattlesnakes often sun themselves both in the clearing and on the roadways.

The CP-3 access proposal suggests that this designation will allow visitors of all abilities to obtain the panoramic view of the surrounding area from the base of the fire tower. This vista has not been

maintained per the 1999 UMP and is grown in significantly. When there is full leaf cover, there is currently no view from the base of the fire tower. Additional vistas listed under the 1999 UMP looking toward the Hudson River, Ashokan Reservoir, and to the south of the road have been lightly maintained, but one must traverse uneven, eroded ground to obtain these views. In addition, these vistas end in a cliff edge with a steep drop off and are thus dangerous. The CP-3 designation may also include the need for several hundred feet of boardwalk to be installed over these eroded trail for those with mobility access concerns to reach the vistas. The cost and environmental impact of any possible boardwalk was not included in the draft proposal.

Other more appropriate alternatives already exist within the Catskills for access to fire towers. Hunter Mountain fire tower has access via the Spruceton trail which is a designated horse trail, complete with adaptive loading and unloading apparatus. This trail takes one from the trailhead to the base of the fire tower and the summit clearing with its Observer's cabin and picnic table. There are two beautiful vistas one passes along this route to the summit. Utsayantha fire tower is another alternative already served by an auto road where one can drive with a passenger car to the summit clearing at the base of the restored fire tower. There are ample parking spaces, picnic tables and grills at the base of the fire tower along with a superb vista. Two other beautiful, open vistas are along the road to the tower. The proposed fire tower at the Catskill Interpretive Center in Mount Tremper will be fully accessible to the base of the tower when completed. This project has been fully funded and completion is expected to occur in 2017.

An additional issue that was not addressed in the draft proposal includes security for the CP-3 permit access. Permits may be issued for up to a year. Giving persons either a key or a number combination to the gate lock that can be shared with others for a year will likely increase the opportunities for vandalism. The facilities at the summit; including the fire tower, cabin, wood shed and outhouse are maintained by the Catskill Fire Tower Project which depends solely on donations and volunteers to do so. The increased vandalism that is likely to occur with the CP-3 designation would place an undue burden on the Project. If there are any hand-railings or boardwalks installed to provide access, who would be responsible for the maintenance and upkeep of same? Again, none of these concerns were mentioned in the draft proposal.

While the FFLA commends your attempts to update the 1999 UMP to address the current usage at Overlook Mountain and the possibility of allowing motorized access under the CP-3 designation, it seems much has been left out in terms of the proposal. We ask that you please re-evaluate and consider all of the impacts this designation may have on Overlook Mountain.

Sincerely,

Laurie Rankin  
Director NYS  
Forest Fire Lookout Association  
845-926-2182  
lauriejrankin@gmail.com