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October 26, 2010

Nancy Stoner  
Trails Planner  
NYSOPRHP  
Agency Building One, Empire State Plaza  
Albany, New York 12238

Dear Nancy:

Parks & Trails New York congratulates OPRHP on the very comprehensive draft New York Statewide Trails Plan. The plan offers an important historical perspective, trail design and management guidelines, and survey results and other information that advocates can continually drawn upon to aid them in their trail creation, operation, and promotion efforts.

**The major focus of our comments is the vision and goals for a statewide trails system found in Chapter VI.**

### **Vision**

We clearly endorse the plan's vision of a statewide, interconnected system of land and water trails linking communities, parks, and natural and historic resources. This has been Parks & Trails New York's long-standing vision and one put forth by members of the New York State Trails Coalition in 2007. However, because we believe that trails are so integral to quality of life, we recommend the vision be expanded to include "*throughout the state, trails will be acknowledged as an essential and mainstream element of community infrastructure, much as utility lines and sidewalks are thought of today.*"

### **Goals**

We strongly support the seven goals outlined in the plan but are concerned about the impact that decreasing levels of funding and staffing at OPRHP will have on their implementation.

Goal 7, "Provide adequate funding and support for trails projects," is critical to the entire plan's success. But this goal cannot be achieved unless local, county and state government officials, elected representatives, and all New Yorkers begin to place a high value on our trail networks and fully appreciate their importance to the state's economy and quality of life. We ask that the incoming OPRHP Commissioner work in concert with the commissioners of other state agencies such as DEC, DOT, DOH, DOS, and DED to seek the vocal support of the Governor for trails in New York. The announcement by the Governor of a commitment to statewide trails planning has been effective in elevating the importance of trails and securing resources and attracting visitors for trails in states such as Indiana and Maryland.

## **Implementation**

The plan presents many excellent objectives but there is no information on how or when they will be achieved or who will be responsible for implementation. The plan's implementation section consists of a list of trail providers and maintainers and sources of funding, along with a description of the Trails Council. It should also contain a detailed, prioritized implementation plan with near, mid and long-term goals and objectives. Ideally it should also state what entity would be responsible for ensuring that the very worthwhile recommendations are carried out.

## **Comments on Goals**

- **Goal 1 - Cultivate Development of a Statewide Trails System**

*We strongly support all efforts to develop a statewide, interconnected trail network.* We are pleased that Figure 5 graphically represents the plan's vision as a network of existing and proposed greenway, long distance, and water trails. However, proposed trail corridors are shown only as lines on a map. The plan offers no further information on the status and condition of these corridors and what might be needed to make them part of an interconnected trail network. There is also no prioritization of the proposed corridors that could be used to inform property acquisition or other development and funding decisions by state and local governments.

Much as the New York State Open Space Conservation Plan identifies priority conservation projects by region, we recommend that this plan go a step further and prioritize the proposed corridors for acquisition and/or development as has been done in the Genesee Transportation Council's regional trails plan. In that plan, proposed corridors are listed as near, mid and long term priorities on a map and an accompanying chart that also provides information on length of project, steps needed for trail creation, and a rough cost estimate. This prioritization would guide state and local governments in satisfying many of the objectives of Goal #1 as they would know the corridors where they should most concentrate their efforts.

We believe the number one trail development priority in the state should be the completion of the Canalway Trail System.

## **Statewide Trails Clearinghouse**

The plan states that the Statewide Trails Clearinghouse would include a statewide trails website and a comprehensive inventory of NYS trails. A trails inventory is clearly needed to fully comprehend and effectively articulate the richness of trails existing in the state. To better advocate for additional trails to complete the statewide network, this inventory should include not only completed trails but also planned trails (funding applied for) and trails under development (funded, active construction projects).

Creation of a comprehensive trails inventory will also require cooperation from multiple agencies, local governments, and non profits engaged in trail operation and development. While logistically difficult to manage, the creating and updating the inventory could foster greater cooperation, communication, and coordination among agencies in decision making regarding trail development.

The plan also states that the Clearinghouse "could manage statewide trail networks, coordinate trail maintenance activities, promote NYS trails, acquire new data, respond to public requests for information, continually update and improve the statewide trails website, monitor trail use,

conditions, and trends, and produce yearly progress reports with new information, products, and trends.” This is an extremely comprehensive list of duties that would do much to increase trail use, encourage additional trail development, and bring added recognition to trails throughout the state.

Yet, while we strongly support the objective of creation of a Statewide Trails Clearinghouse, we are unclear who, in addition to the Statewide Trails Coordinator, will be responsible for accomplishing these many tasks, especially with reductions in OPRHP funding and staff. We are also unsure how much trails data the Clearinghouse would manage, as the plan states the Clearinghouse would “acquire, store, and distribute information on all trails across the state under the coordination of the Statewide Trails Coordinator,” but it is not readily apparent which trails that represents.

If New York State were to put the necessary level of resources into the establishment and ongoing operation of the Statewide Trails Clearinghouse, it would make great strides toward becoming a pre-eminent trails state. In so doing our residents would be more active and enjoy an improved quality of life and healthier economy as visitors from across the nation and abroad are drawn to experience our historic communities and varied and beautiful landscapes accessible through the state’s trail network.

- **Goal 2 - Provide opportunities for all New Yorkers to have easy access to trails.**

We especially support the objective of providing and improving trails and trail information for persons with disabilities and ask that OPRHP continue to devote resources to training personnel and volunteers in the Universal Trail Assessment Process (UTAP). We suggest that this information also be added to the trails database and that assistance be provided to encourage trail managers to incorporate accessibility information in signage at trail heads.

- **Goal 3 - Increase education about, cultivate support for, and promote the use of New York State trails among the general public.**

New York is an amazingly trail-rich state but it does not have the reputation or popularity among trail enthusiasts that it should. To realize the outlined objectives for this very important goal, there should be a coordinated program of trail promotion with an annual trails promotion work plan that involves multiple state agencies assuming responsibility for various aspects. For example, I Love NY should be tasked with promoting trails in statewide and regional campaigns with emphasis on trails included in the statewide network. And, the NYS Department of Transportation, DEC, and OPRHP should immediately begin to address the need for a uniform system of wayfinding signs that direct motorists to trail heads and advertize our major trails on signage at highway exit ramps.

- **Goal 5 - Promote communication, cooperation, and coordination among all government entities, landowners, user groups, and other non-governmental organizations involved in trail planning, development, management, and maintenance.**

This goal is central to ensuring the development of a statewide trails network and that the other goals and objectives of the plan are met. Therefore, we suggest the establishment of a federal and state interagency working group that meets at least annually and focuses on trail planning and development. This body would include the commissioners of parks, recreation and historic preservation, health, environmental conservation, and transportation; the director of the New

York State canal corporation; the chairman of the empire state development corporation; the secretary of state; the executive director of the Hudson River Valley Greenway; and the executive director of the Governor's Traffic Safety Committee, and a representative from the State Trails Council and Parks & Trails New York. Such a group would raise the importance of trails within the state and be an effective means of accomplishing and coordinating achievement of the plan's objectives across agencies and alleviate duplication of effort.

The working group should also be charged with seeking input from local governments; regional planning authorities; regional tourism agencies; and federal agencies involved with greenways and heritage corridors. Using the example of the state Open Space Plan process, regional trails advisory committees could be established which would meet annually or biennially. They could provide feedback on trail issues and status and prioritization of proposed trails included in the statewide network as well as receive updates on the Statewide Trails Plan implementation progress.

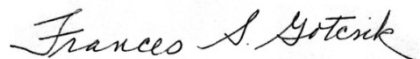
To encourage the inclusion local and regional planning process, we propose that extra points be awarded to towns, villages or counties with established trails plans when applying for CMAQ, LWCF, RTP, TEP, and EPF-funded grants.

**Goal 6 - Conduct research to aid in the planning and management of trails.**

We strongly support additional monitoring of data that will make the case for the popularity and value of trails to the economy of communities across the state. Having standardized protocols for collecting data on counts and economic impact will add to the validity of results and facilitate comparisons among trails throughout the state. This information is essential to justifying the importance of New York's trails with lawmakers and the public and winning the grants needed to implement other aspects of the plan. We suggest using the National Bicycle and Pedestrian Count protocol for trail counts and working with SUNY colleges to create a model survey process that trail managers can use to obtain data on economic impact.

The New York Statewide Trails Plan has much to offer as a resource and a guide for the future, but the importance of our trails is too great to settle for a plan without more teeth. **The Plan needs greater detail regarding responsibility for and timing of implementation, so it can fully become the actionable, accountable blueprint we must have to make New York a pre-eminent trail state.**

Sincerely,



Frances Gotsik  
Director of Programs and Policy

## **Parks & Trails New York Specific Comments on text**

### **Page 1, second paragraph,**

first sentence: In the list of trails mentioned, include also the 360-mile Erie Canalway Trail.

Last sentence: add Cayuga-Seneca when mentioning additions to the Erie and Champlain Canalway Trails

### **Page 2, first paragraph**

Third sentence beginning “The implementation section describes.....” The word Council should be included after the words “the State Trails.”

### **Page 17**

Should the mountain bike trail networks that exist on Long Island also be noted in the last paragraph in the Mountain Bike Trails section?

### **Page 19**

#### **K. Bicycle Routes**

We wish to register our strong support for use of the Erie Canalway Trail as a major element of US Bike Route 30 across New York State. Discussion of US Bike Routes is underway at NYSDOT and has been discussed at the statewide Bicycle-Pedestrian Advisory Committee.

### **Page 24**

“If only 10% of this recreational activity takes place on a trail, it can be reasonably assumed that \$40 million dollars is generated in direct expenditures each year relating to trail use based on the average spending per trail visit established in the 2008 Trail User/Economic Survey.”

We are pleased that this plan begins to characterize the impact that trails can have on the economy of the state. A high priority must be placed on gathering additional credible economic impact data as without this information it will be difficult to make the case for trails with lawmakers and thus secure the resources to implement the goals outlined in the plan.

### **Page 25 and 27**

In the sections on Spiritual Experience and Green Infrastructure we strongly support the assertion that “trails are indeed vital infrastructure” (p.25) and “green infrastructure” (p.27). We believe trails should be considered an essential element of community infrastructure, a concept that should be added to the vision for trails in New York State.

### **Page 45**

The bullets from “Limit trailhead parking” to “Identify and encourage the use of alternate trails” should be indented under the bullet “Consider the following actions....”

### **Page 49**

Volunteer or paid “trail rangers” are suggested as strategies to address user conflicts and illegal use and safety and enforcement. Through the efforts of Parks & Trails New York and the Friends of the Mohawk Hudson Bike Hike Trail, a successful Canalway Trail Ambassadors

program has already been established for sections of the Erie Canalway Trail. We recommend citing this program as a reference.

**Page 51**

Treadway width of 6-8 feet seems too little for a two-lane greenway trail that will have multiple uses.

**Page 54**

We strongly support and encourage additional attention to trail accessibility and use of the Universal Trail Assessment Process (UTAP) to evaluate trails.

**Page 63**

We suggest adding “Advocate for legislation, funding, and policies that positively affect trail development” as another bullet under the roles that volunteers can play. We also suggest that the plan mention the existence of the New York State Trails Coalition, a group of 85 trails groups, educational institutions, nature centers, local development agencies, land trusts, historical organizations, and village, town, and county governments from all regions of the state. The goal of the Coalition is to foster enhanced networking and stronger working relationships among New York's trail advocates. Each year Parks & Trails New York works with Coalition members to organize an annual Trails Advocacy Day during which members meet with lawmakers to discuss issues related to funding and legislation affecting trail promotion, operation, and development.

**Page 65**

**Funding**

We suggest adding Parks & Trails New York's Capacity Building Grants Program as another source of funds for park and trail not for profits. <http://www.ptny.org/advocacy/grants.shtml>

Parks & Trails New York's Capacity Building Grants program for park and trail groups provides grants of up to \$3,000 to strengthen not-for-profit organizations that are working to build and protect parks and trails in communities across the state. Funds can be used to assist with activities associated with organizational start-up and development, training, communications, and volunteer recruitment and management