



**Comments On Draft Statewide Greenway Trails Plan/  
Draft Generic Environmental Impact Statement**  
January 6, 2020

Pursuant to the Notice of Completion/Public Hearing on the Draft Statewide Greenway Trails Plan and the Draft Generic Environmental Impact Statement (DGEIS) issued November 19, 2020, Parks & Trails New York respectfully submits the following comments.

We commend the Office of Parks, Recreation and Historic Preservation (OPRHP) for completing the Draft Statewide Greenway Trails Plan in a timely manner. The draft plan provides New York State residents with a comprehensive summary of the importance of greenway trails and the benefits that greenway trails offer communities, and lays out a vision for the future of the state’s greenway trail network through a strong set of recommendations.

The plan comes at a critical time for the state’s greenway trail network. With the Empire State Trail set for completion, and public support for greenway trails growing in communities across the state, the Greenway Trails Plan takes advantage of this momentum and proposes steps to create an interconnected statewide network of greenway trails that serves all New Yorkers.

While we are appreciative of OPRHP and the stakeholders that have contributed towards this planning process, we believe that the final plan can be strengthened by addressing certain issues. We look forward to seeing a final plan that presents a comprehensive roadmap to guide future trail planning efforts and puts New York State in the strongest position to achieve its goals and build upon its legacy when the plan is updated in five years and thereafter.

**Legislative Requirements**

The Draft Statewide Greenway Trails Plan was completed as a requirement of legislation (A.5035B/S.4416B) signed into law in 2019. The legislation lists a number of specific elements that the Greenway Trails Plan must include. Several of these need to be addressed or expanded upon to meet the requirements of the authorizing legislation.

The language in the authorizing legislation is both important and precise. Section 1(b)(i) requires that the “vision for a statewide network of non-motorized primary corridors linked to and enhanced by regional and local non-motorized multi-use trails... include trail uses to be addressed in the plan; goals for geographic distribution; goals for universal accessibility; and general goals for new trail acquisition and development.” Based on these requirements, we urge OPRHP to revise the existing vision language to make more explicit which primary corridors, beyond the Empire State Trail, will provide the foundation for the state’s trail network. The vision language should also highlight the importance of closing gaps in the existing trail network, including replacing on-road sections of trail with off-road trails, especially along the Empire State Trail.

In addition, to meet the requirements of the legislation, the plan needs to explicitly address geographic distribution, universal accessibility, and new trail acquisition and development. The vision outlined in the draft plan does not offer specific goals for geographic distribution beyond “a network of shared use paths that provide all New Yorkers and visitors opportunities for healthy and active recreation, routes for alternative transportation, and the ability to connect to and enrich our communities and natural landscapes in urban, suburban, and rural settings.” Without a specific goal for geographic distribution, including place-based recommendations, how can a goal of this magnitude and importance be realized? Beyond a generic goal for increased distribution, and a recommendation that “further data collection, analysis, public outreach, and prioritization at the state, regional and local levels” occur, a clear process for accomplishing this goal would make for a much stronger plan that would better meet the requirements of the legislation.

Similarly, the recommendations for implementation identified in Chapter 8 for “expand[ing] the state’s greenway trails system to reach more New Yorkers in more areas,” and “enhanc[ing] bicycle and pedestrian transportation options by connecting greenway trails and communities” does not specify how the geographic distribution of greenway trails will be actualized in these scenarios. A specific geographic distribution goal can help guide a statewide assessment and guarantee that development of greenway trails that meet these criteria are prioritized.

The plan recognizes that “partnerships are key to the successful implementation of this goal and recommendations” and “proper planning with input from local communities and governments is critical to this goal’s success,” but does not specify which partners should be leading this initiative, or supporting its efforts, beyond a generic list of potential stakeholders.

The plan includes a goal to prioritize the “development and expansion of greenway trails in underserved communities.” The plan defines underserved groups as “people in at least one of the following categories: low income, minority, elderly, limited English proficiency, or persons with disabilities,” but does not clearly communicate how “underserved communities” will be assessed and therefore prioritized. While a list of clear recommendations for implementing this goal is included in Chapter 8, the plan doesn’t identify which organization or entity will be responsible for carrying out these steps, leaving the goal uncertain and unlikely to be acted upon.

The plan also conflates the meaning of “accessible” as it relates to persons with disabilities and those lacking physical access to greenway trails. The plan should make it clear to readers that goals for universal access are specific to proximity to greenway trails, while achieving universal accessibility along greenway trails refers to providing access to those with mobility issues. The goal to “enhance bicycle and pedestrian transportation options by connecting greenway trails and communities” refers to access as it relates to proximity. However, the legislation requires the establishment of “goals for universal accessibility” – clearly referring to persons with disabilities and mobility issues. A goal to increase accessibility “for people with disabilities and mobility issues” is only incorporated into the plan as it relates to New York’s 2020-2025 Statewide Comprehensive Outdoor Recreation Plan that emphasizes the importance of “more accessible open space and recreation opportunities... as the state’s population ages.” Although the plan recognizes that stakeholders identified “universal design” as an important consideration “to ensure that the majority of trails are welcoming and accessible to children, the elderly, and those with different mobility needs,” it lacks a specific goal to achieve this standard other than inclusion of best practices from *Design Guide, The Empire State Trail*. OPRHP should add specific recommendations into the final plan that detail how the state can achieve universal accessibility on greenway trails in the future.

While the above-mentioned goals attempt to address the legislative requirements, they need more clarity, cohesion, and accountability. Explicitly stating the geographic locations that should be prioritized, outlining a plan for consistent trail design standards to achieve universal accessibility, and identifying locations suitable for future

acquisition and development would greatly strengthen the plan. The legislation states very clearly that the Office of Parks, Recreation, and Historic Preservation “will have primary responsibility for implementation of the plan.” Therefore, the plan should specify those instances in which OPRHP would not be responsible for implementing the recommendation, and identify which organization would be responsible, establishing a clear set of expectations and accountability.

The plan clearly states that “the Statewide Greenway Trails Plan inventory map serves dual purposes: it provides trail users and the general public with information on existing or new trail opportunities across the state, and it provides trail managers, planners, and advocates with a valuable tool to identify trail opportunities, gaps, and needs.” Section 1(b)(iii) of the legislation calls for the “identification of new non-motorized multi-use trail opportunities including, but not limited to, transportation (rail, canal, trolley) corridors - existing, abandoned, or under consideration to be abandoned, under-utilized or closed roads, utility corridors, and natural corridors such as waterways and waterfronts.” However, the plan doesn’t include ways to take advantage of these opportunities and fulfill the needs they present. Sections 1(b)(i) and 1(b)(iv) reaffirm that the plan should include “goals for new trail acquisition and development” and “a comprehensive set of non-motorized multi-use trail recommendations, including but not limited to acquisition and development priorities,” respectively. This information is not captured within the interactive map, or made explicit within the planning document. Including the “steps to prioritize closing gaps,” as the plan says will be addressed in Chapter 8, is a key missing element that would make the plan much more impactful.

Adding a clear set of policies for OPRHP and others to advance, including a plan to carry out the “recommendations for implementation,” will help realize these goals identified in the draft plan. A clear set of action steps to actualize the “recommendations for implementation” through collaboration and consultation with the other state agencies and stakeholders at the conclusion of the plan would provide a strong roadmap for the future. As specified in the legislation, OPRHP should “work with stakeholders and partners to review, prioritize, and advance the goals and recommendations in this and other relevant planning documents.” The roadmap for doing so should be included as part of the final plan document.

To ensure that the legislative requirements are fulfilled, PTNY recommends that OPRHP revisit these requirements and find ways to integrate them into the final plan. At present, the “recommendations for implementation” found in Chapter 7 reads more like an appendix than steps for implementation. These ideas should be incorporated into the planning document at points where relevant to the subject matter. This will help link the goals of the plan to the various planning components and demonstrate how they impact greenway trail development (i.e., health, climate change, transportation, equity, access, economy).

### **Plan Organization and Presentation**

In addition to satisfying the legislative requirements, several other modifications will enhance the plan’s readability, cohesiveness, and inclusivity. In several instances, terms are used but not clearly defined. Two important examples are the terms “underserved communities” and “environmental justice communities.” Both terms are mentioned throughout the document. “Underserved groups” are defined on pages 52-53, but “underserved communities” and “environmental justice communities” are never defined.

Better organization and cohesion of chapter 5 (Needs, Trends, and Resources) would make the points stronger and more understandable. It is unclear which chapter sections are needs, which are trends, and which are resources. The plan offers examples of current trends, but lacks further explanation as to the importance of these trends or relevance to the future of greenway trail development in New York State. The plan does not explain why the wearable technology trend is significant or has an impact on greenway trail development, or explain the relevance of dockless bike shares for trails beyond stating that dockless bike shares exist. In this same chapter, the sections of

Transportation, Sustainable Development, and Climate Change are disparate and disconnected when, in actuality, these areas are highly interconnected and interdependent and the connection between them provides significant impetus for the further development of greenway trails.

Finally, making the final plan available in Spanish will greatly enhance inclusivity. Spanish is the second most commonly spoken language in the state and 19% of New York's population identify as Hispanic or Latino. Offering this document in Spanish will allow for this demographic to be part of the planning process. As was made evident in PTNY's Greenway Trail User Survey Draft Results and Analysis, the vast majority of survey respondents identified as white (93%), a far greater proportion than that of the state's population (56%). It is important to capture the views and opinions of minority populations, including black, indigenous, and people of color (BIPOC) and include them in the final plan.

### **Conclusion**

Parks & Trails New York appreciates the opportunity to submit comments on the Draft Statewide Greenway Trails Plan/Draft Generic Environmental Impact Statement (DGEIS).

We strongly recommend that the Office of Parks, Recreation and Historic Preservation revisit the legislative requirements for the plan and explicitly address them. Moreover, we recommend that the vision statement that is intended to guide planning efforts make specific reference to the goals that offer a comprehensive, and tangible blueprint for future development opportunities. The goals and recommendations for implementation found in Chapters 7 and 8 will form the core of this effort; however, a clear strategy is needed for how this process will unfold. The plan states that "future versions of this plan may focus directly on specific topics, goals, and recommendations identified in this plan," but we strongly suggest that the final plan identify exactly which topics, goals, and recommendations will be pursued as a result of the 2020 planning process and which organizations will lead this effort.

To allow readers to better understand the major plan components and make connections between the goals of the plan and the significance of efforts already underway, PTNY strongly suggests revision of the chapter sections and headers to reflect the focal points of each topic and the implications they have on greenway trail development.

Finally, PTNY urges that the state support "Alternative 1 — Adoption and Implementation of the Statewide Greenway Trails Plan" so state agencies, stakeholders, and interested parties can begin the work of implementing the recommendations contained in this document.