

Countywide Trails Initiative Minutes

Monday, September 9th, 2024, 4:30 pm

50 W. High Street, Ballston Spa, NY 12020

Chairman's Remarks

Bonnie Nightingale, Saratoga PLAN's Stewardship Manager left PLAN to assume the role of Stewardship & Outreach Director at the Grasslands Bird Trust based in Schuylerville. Please welcome Magnolia Roosa.

Old Business

CWT goals and Metrics: A draft mission and goals statement was sent out with this meeting invite. Comments should be sent to the Chairman before October 31, 2024. Metrics (how well CWT and the county are doing on trails) are also in draft stage, feel free to send your thoughts to the Chairman.

Progress on county/PLAN trail mapping/GIS initiative to reviewed at next meeting.

New Business

Stormwater management : Saratoga Trail Alliance (STA) reports: DEC region 5 ruling on storm water management in Tupelo forest included trails in area calculation. Costs associated with new mitigation requirements are thought to be a significant impediment to new land protection projects that include trails. New SPDES guidelines are up for public comment until October 1 and STA has issued a draft comment letter (attached).

As part of its ongoing outreach and information sharing program, COC chair Todd Shimkus will be the speaker on September 23rd at Whitman brewery (basement) at 6:30.

<https://www.saratogatrails.org/event-calendar/monthly-community-chat-w5flk>

Wetlands – DEC: Starting January 1, 2025 - The current NYS Freshwater Wetlands Maps will no longer limit DEC regulatory jurisdiction to wetlands depicted on those maps. Instead, maps will become informational, and any wetlands that meet the applicable definition and criteria will be regulated by DEC and subject to permitting, regardless of whether they appear on the informational maps.

Small wetlands of "unusual importance" will be regulated if they meet one of 11 newly established criteria listed in the new legislation.

Effective January 1, 2028, DEC Jurisdictions will start at 7.5 acres.

Milton: Town center to Ballston spa link. Town is waiting for woods hollow transfer to Milton, governor's signature needed. Met with Saratoga Springs; McMillin parcel is still a problem. See attached focus area maps -Figures 1 and 2.

Ballston: Ballston Veterans trail extension to Ballston Spa trail phase 1 is in engineering to Beacon Hill with access to Route 50. Funded to extend into village. Zim Smith connection options are being considered. Mourningkill crossing and Brookline road crossings will be expensive. See attached map - Figure 3.

Clifton Park – The Town was just awarded state funding to plan/design and construct a new trail segment from Sitterly Rd to Clifton Country Road along Clifton Park Center Road, connection over I-87 still needed.

ROW phase of new multi-use trail and sidewalks along Hubbs Road and Main Street in the hamlet of Jonesville (using Climate Smart Communities funding).

Halfmoon: May have missed subdivision opportunity to complete segment of town planned trail. Lesson: Need to attend planning board meetings, stay on top. For trail plans to carry more weight, towns would need to formally adopt their trail plans.

Champlain Canal: During COVID, when a commodity prices were at their peak a \$4 million estimated cost to complete the proposed route was obtained. Alternatives, including incremental development, alternate routes possibly using private properties, etc. are being explored. The County hopes to turn its effort to Champlain Canalways Trail after Zim Smith is completed to Saratoga Spa Park

Ballston-Clifton Park-Glenville. A proposed connection between the Ballston Veterans trail to the Hudson-Mohawk bike path at Rexford and Freemans Bridge was the subject of a May meeting with Ballston and Glenville officials, Saratoga County Planning and Saratoga County board of supervisors trail committee Chairman (Joe Grasso). There was broad agreement that this should get going and a feasibility study is next on the queue. The parties have been reaching out to secure funding. The attached maps show the regional context and the detail of the Ballston –Rexford segment. See above for Ballston progress northward. This is third in queue for Saratoga County after Zim Smith and Champlain Canalways Trail in Halfmoon. See figures 4 and 5.

Most of the route is on National Grid gas line ROW. Working with NG has been problematic in the past. An assembly bill (A8311- Fahy) seeks to make trail planning in cooperation with utilities easier. It did not get out of committee this year. It also does not include gas line ROW specifically.

Outreach- trails at schools: Jeff Olson gave an example of trails constructed at the Maple Avenue Middle school in Saratoga Springs specifically for mountain bike use. This trail

project was a joint effort, with Saratoga Mountain Bike Association (SMBA), SSCSD (school district), and Saratoga Shredders all working together to make it happen. exploring the trails on bikes - this is just the beginning of what's possible when we come together

Who is not being represented at CWT: SMBA (Saratoga Mountain Bike Association)
<https://saratogamtb.org/>

Attendees:

Bill Bechtel	Ballston, Town of Ballston Trail committee	wiltbec@gmail.com
Audrey Burneson	NYS DOT - Trail contact: region 2	Audrey.Burneson@dot.ny.gov
Bill Clarke	Corinth	laughingbrookfarm@hotmail.com
Eric Connolly	Town of Ballston, supervisor	
Phillip Corney	NYS OPRHP Sar\Cap Region	Philip.Corney@parks.ny.gov
Matthew DeSimone	NYS DOT, region 2, trail coordinator	matthew.desimone@dot.ny.gov
Dau Dietershagen	ADK Mt. Club, Saratoga - Glens Falls Chapter	d2hagen@yahoo.com
Andy Garrison	NY-NJ trail conference - LP	
Joe Grasso	Supervisor, town of Charlton, county board trails chairman	supervisor@townofcharlton.org
Bill Herman	Half Moon, Halfmoon trail com., PLAN board, CWT chairman	wherman1@nycap.rr.com
Barbara Kerr	Town of Milton councilwoman	bkerr@skidmore.edu
Kim Lambert	Saratoga county planning	Klambert@saratogacountyny.gov
Bill Lasher	Friends of equine trails	
Dan Lynch	bikeatoga.org	
Scott Miller	Clifton Park, CWT secretary, PLAN advisory Council	millerrs@mindspring.com
Mary Ann Morgan	Town of Milton	mamstax@nycap.rr.com
Jeff Olson	Saratoga Trails Alliance (STA)	jeffolson@the3rdmode.com
Pete Signorelli		
Ed Snyder	Greenman Pederson, Inc	esnyder@gpinet.com
Jeff Williams	Saratoga county Planning	jwilliams@saratogacountyny.gov
Dave Woodin	Waterford; director of planning, Champlain Canalway liaison	woodind@town.waterford.ny.us
Magnolia Roosa	Plan Stewardship coordinator	magnolia@saratogaplan.org

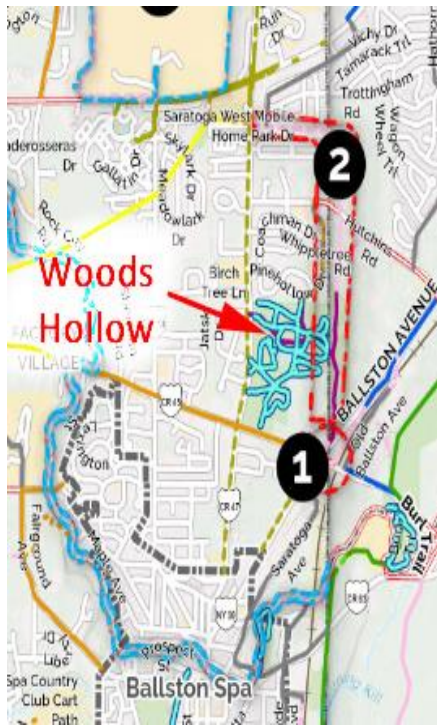


Figure 1: Milton- Ballston Spa connector project (2)

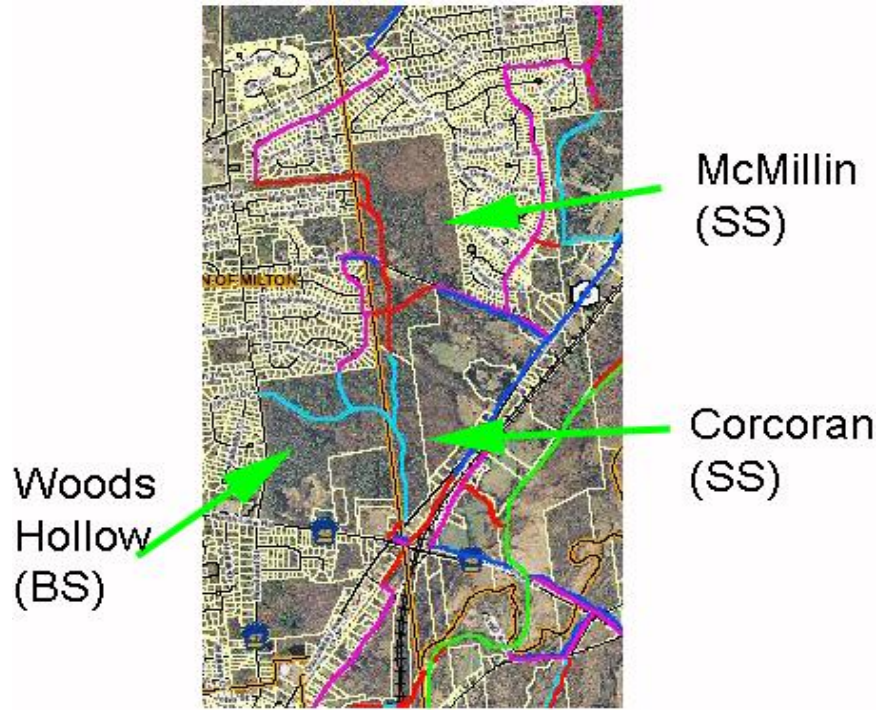


Figure 2: Parcels in Milton-BS connector

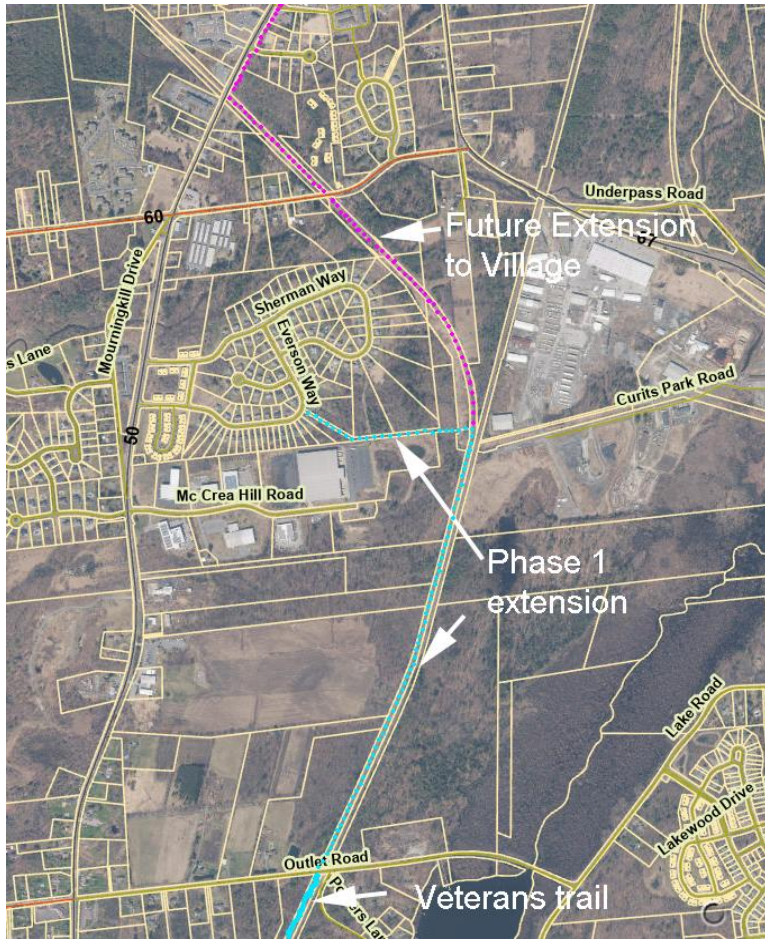


Figure 3: Ballston Bike path extension

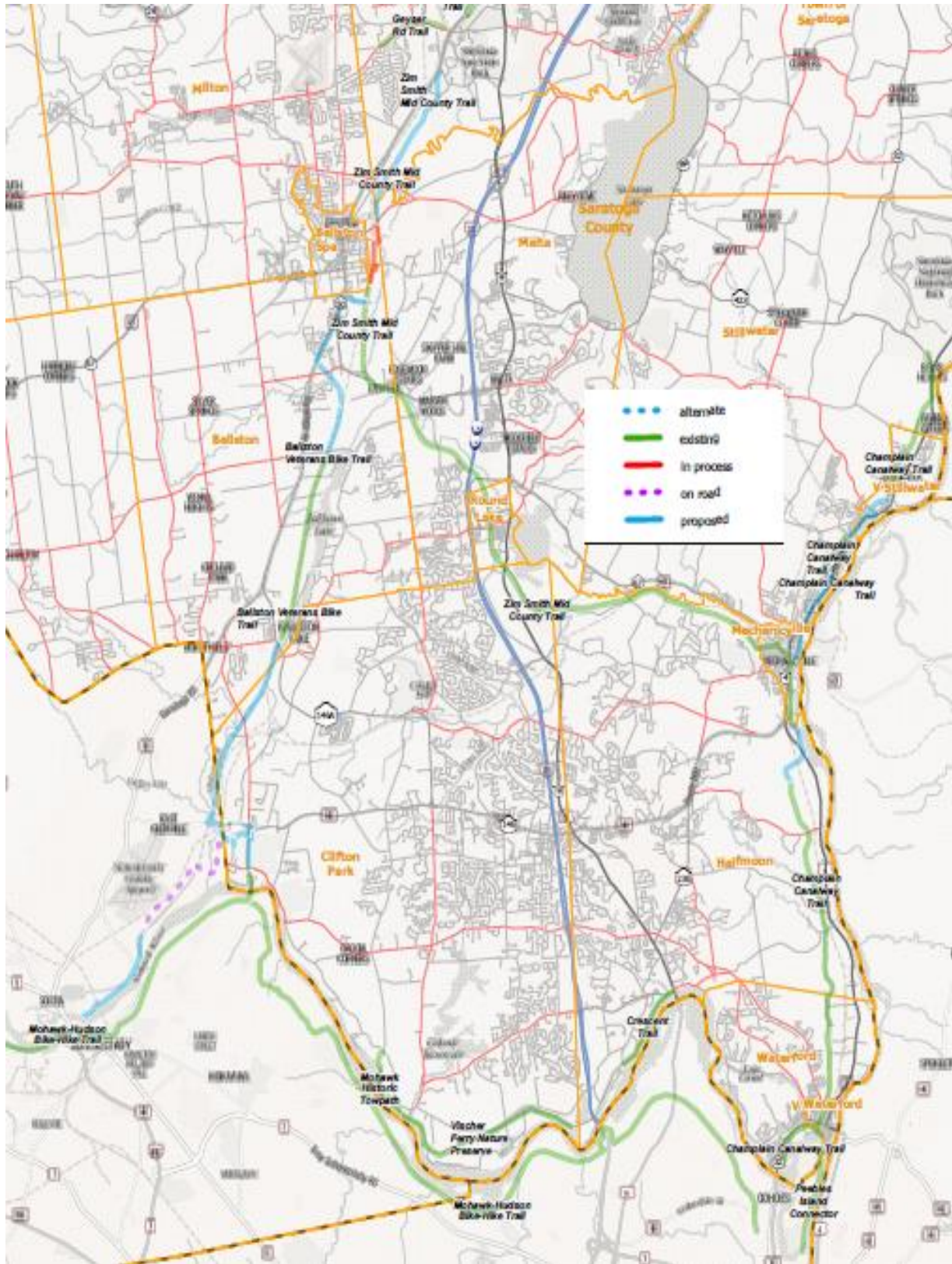
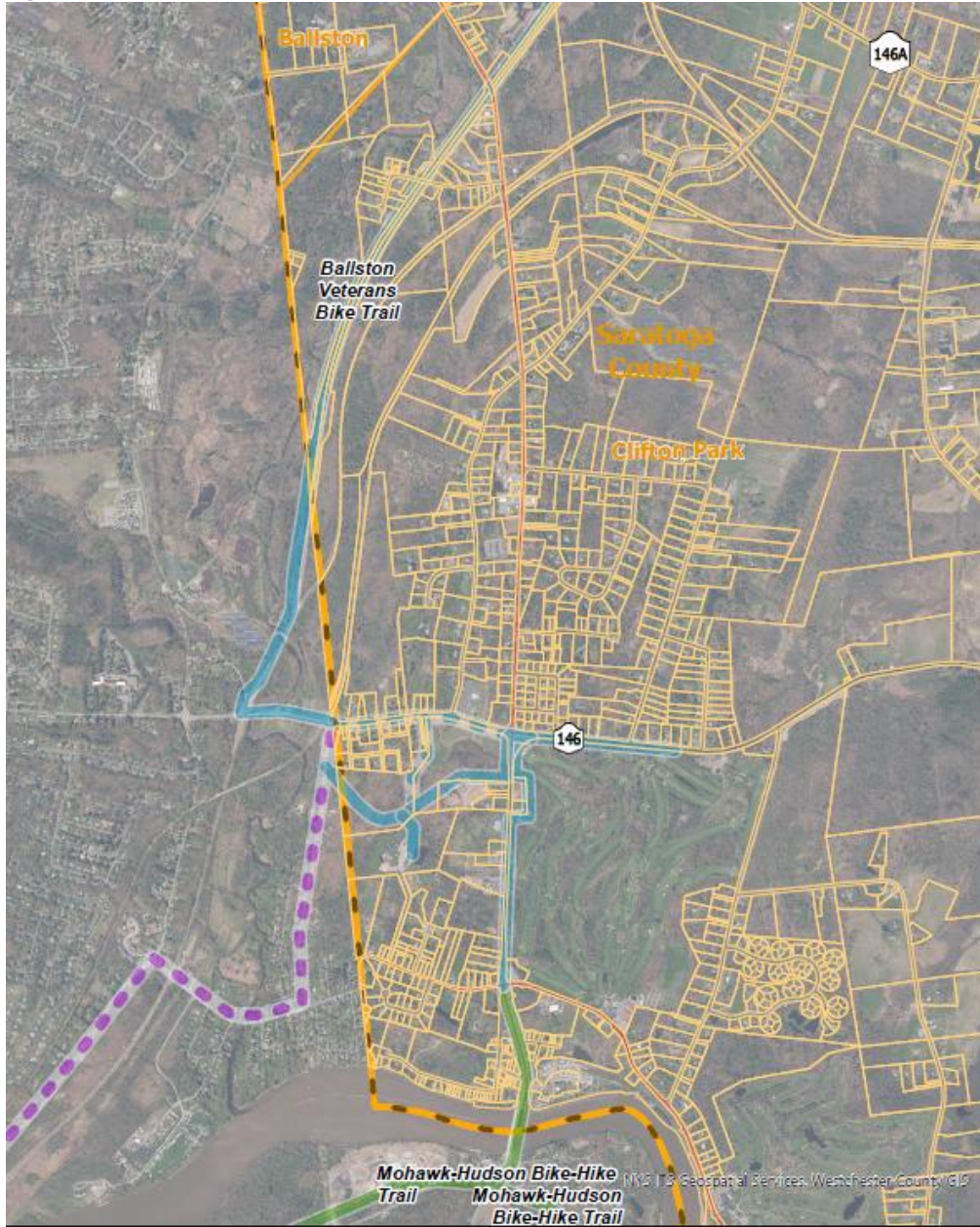


Figure 4: Regional context for Ballston - Rexford - Glenville trail link – contact Scott Miller for high resolution PDF file.

Figure 5: Ballston - Rexford detail



STA comment on 2025 SPDES proposal:

Anna Laloë, PhD

Executive *Director*, Saratoga Trails Alliance

www.SaratogaTrails.org

Phone: (781) 879-3647

Email: Anna@SaratogaTrails.org

6th September 2024

Public Comment on SPDES General Permit for Stormwater Discharges from Construction Activity (2025 CGP)

Dear Governor Kathy Hochul, Interim Commissioner Sean Mahar and Deputy Commissioner James Tierney:

As the Executive Director of Saratoga Trails Alliance (STA), I would like to submit my comments on the draft 2025 SPDES General Permit for Stormwater Discharges from Construction Activity (CGP). My comments specifically concern the impacts of these regulations on trail projects across New York State.

As you know, trail projects are often driven by philanthropic landowners, land trusts, conservation trusts, and nonprofit organizations that work with limited financial resources. These projects offer immense community value by creating public access to natural areas, encouraging outdoor recreation, and preserving open spaces. However, the current stormwater mitigation measures required for these projects under the CGP are financially burdensome, are arbitrary and unnecessary considering the nature of trails, and will deter future trail development. The federal EPA allows states the discretion to set specific Stormwater Pollution Prevention Plan (SWPPP) requirements, and exceptions can be made to better align with the unique nature of trail projects. Lumping these projects in with commercial building contractors under the same SWPPP requirements is not only impractical but also jeopardizes the feasibility of vital community-driven trail initiatives.

An example of the DEC providing flexibility for other types of projects can be found in Table 2, which allows athletic fields to create or modify impervious surfaces totaling less than 5% of the disturbed area. This provision includes no specific limitations on the types of impervious surfaces, meaning even parking areas can be included. For instance, an athletic facility that was built in Niskayuna (I won't share the exact location), with roughly 9 acres of disturbance, could create a 0.45-acre parking lot (around 70 spaces) without requiring post-construction stormwater management. In contrast, if a 5-mile trail (with similar disturbance, about 9 acres) were built, the project would be required to implement costly post-construction stormwater management for even a small, two-space parking lot. This discrepancy highlights the need for a similar exception to be made for trail projects, which often involve minimal impervious surfaces and should not be held to the same stringent requirements as other developments.

Recommended Changes to the CGP

We respectfully request that the following changes be made to the CGP to better reflect the nature and scale of trail projects:

1. **Exemption for Parking Lots Under One Acre (Table 1)**

We ask that language be added to Table 1 that exempts trail projects from the cumulative disturbance calculations when the parking lots associated with these projects disturb less than one acre of soil. This would ensure that while trail projects may still trigger a SWPPP with erosion and sediment controls, they would not trigger the need for post-construction stormwater management *unless the parking lot itself exceeds one acre of disturbance.*

2. **Amendment to Parking Lot Language (Table 2)**

Original: *Parking lot construction or reconstruction, including parking lots constructed as part of the construction activities listed in Table 1.*

Revised: *Parking lot construction or reconstruction, including parking lots constructed as part of the construction activities listed in Table 1 if the parking lot disturbance exceeds (1) acre.*

The intent of these changes is to clarify that trail disturbance should not be counted toward the cumulative square footage that triggers the CGP. In many trail projects, the construction of the trailhead parking lot—often a simple gravel clearing—falls far below the one-acre threshold for the CGP. Requiring costly stormwater mitigation measures for such projects is not only prohibitive for landowners and nonprofits but also arbitrary, given that the trail surfaces are often permeable and include runoff and erosion reduction structures, and therefore do not contribute significantly to stormwater runoff.

Furthermore, if the DEC wants to encourage *more* trails and recreational opportunities to be developed in order to ease overcrowding in popular destinations like the Adirondack Park, it should foster such privately funded efforts when water quality is truly not at risk. Creating more accessible trails statewide would alleviate pressure on overused areas while expanding outdoor recreation opportunities for all New Yorkers, with minimal to no need for resources from the state.

These minor adjustments will help protect small-scale, community-focused trail projects across New York from excessive and unnecessary costs, ensuring that these vital projects can continue to enhance public access to outdoor spaces while still maintaining proper environmental stewardship.

We thank you for your attention to this matter and look forward to the inclusion of these changes in the final CGP to support the viability and sustainability of trail projects statewide.

Sincerely,

Anna Laloë

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