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October 16, 2008

Mr. Joseph Krupitza  
NYSDOT  
Freight Bureau  
50 Wolf Road, Pod 5-4  
Albany, NY 12232

Re: PIN 4935.79.301  
Norfolk Southern Railway, Portage Viaduct

Dear Mr. Krupitza:

Thank you for the opportunity to comment on PIN 4935.79.301, rehabilitation or replacement of the Norfolk Southern Railway, Portage Viaduct. Parks & Trails New York wishes to be considered as an interested agency in this project.

Founded in 1985, Parks & Trails New York is a statewide not-for-profit membership organization dedicated to enhancing the health and quality of life of New Yorkers through the use and enjoyment of a growing network of parks, pedestrian and bicycle trails, greenways, and heritage corridors throughout the state. Our interest in this project stems not only from our commitment to protect and revitalize our magnificent state parks such as Letchworth, but also from our experience with two trail systems that are located in the park and which would be directly affected by this project, the Letchworth Branch of the Finger Lakes Trail and the 90-mile Genesee Valley Greenway.

We have reviewed the background information, goals and objectives, and Preliminary List of Alternatives presented in the Scoping Document for the Portageville Bridge, also known as the High Bridge, and have the following comments:

- Impact on aesthetic resources – visual impact  
For many, both today and in generations past, the view of the High Bridge spanning the gorge is the image that is emblematic of Letchworth State Park. In the late 1800s, the High Bridge was the terminus for Pennsylvania Railroad excursion trains that brought day trippers from Rochester to spend the day at the bridge picnicking and enjoying the river and gorge. Still today the High Bridge is the cover photo for the 2008 Letchworth State Park Vacation Guide and the Perry Area Chamber of Commerce and Livingston County Tourism websites represent the park with photos of the bridge.

Issues to address in the Environmental Impact Statement (EIS):

- The EIS should ensure that the design of any other bridge added to the view shed will complement, not comprise, the view of the High Bridge and its natural surroundings.
- A preliminary design for any new bridge should be included in the EIS.
- Exact location of any new bridge should be detailed in the EIS. The materials presented did not identify the location for the new bridge making it difficult for us to fully comment on its impact.

- Impact on historic and archaeological resources

Since it is a contributing element to the Letchworth State Park National and State Register listings, erection of a new bridge in close proximity to the High Bridge would seriously compromise the integrity of this important historic resource. As noted above, any design for a new bridge must be executed to minimize impacts on the historic High Bridge. Because it would destroy a structure of great importance to the landscape and history of the park, as well as the transportation history of the region, we do not support the High Bridge's destruction as part of this project.

Issues to address in the Environmental Impact Statement:

- The EIS should detail maintenance costs for the existing High Bridge if it were to be used only by pedestrians, not 286,000-pound freight trains.
- The EIS should include the full cost of removal of the bridge by the railroad. Instead of expending these monies to destroy the bridge, we recommend that the money instead be set aside as an endowment or maintenance fund that can be used by the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP) to support maintenance and operation of the bridge as a pedestrian walkway.

- Impact on open space and recreation

The Scoping Document rightly notes that because of its location the project may present short and long-term impacts to availability and enjoyment of land within the park. It also states that “the project also provides an opportunity to enhance the recreational activities within Letchworth Park” and mentions the “opportunity to create a pedestrian bridge crossing connecting trails on either side of the Genesee River. However, the Scoping Document does not specifically note the existence of two major long-distance trails that traverse the east side of the park along the former Genesee Valley Canal and Pennsylvania Railroad corridor, the Finger Lakes Trail and Genesee Valley Greenway. These trails are located directly under the High Bridge and would be impacted by any construction and demolition activities.

Issues to address in the Environmental Impact Statement:

- The EIS should address the issue of alienation of park land that would occur with construction of a new bridge parallel to the High Bridge. PTNY opposes park alienation that results in a net loss in the amount of parkland, aesthetic value or recreational opportunities for the same population that is served by the affected parkland. Furthermore, PTNY supports due consideration of a net gain in parkland or recreational opportunities as mitigation for the alienation.
- The EIS should detail the full extent of compensation that will be provided to OPRHP as a result of impacts to the land and disruption of activities, temporarily or permanently, within the park.
- The EIS should provide compensation to the Finger Lakes Trail Conference and Genesee Valley Greenway Partners in terms of trail improvements or other considerations for the impact of the project on the Finger Lakes Trail and Genesee Valley Greenway. For example, the railroad could provide funds to NYSOPRHP to acquire an easement on adjoining private property that would help create a more stable Genesee Valley Greenway and Finger Lakes Trail between the High Bridge and Route 436 in Portageville.
- The EIS should state specifically what will be done to additionally “enhance the recreational activities” in the park.
- The EIS should provide details on the location and design of any new proposed pedestrian bridge. A pedestrian trail bridge at near river level, however, can never take the place of the view that could be gained from the High Bridge 245 feet above the gorge. We strongly encourage the railroad and OPRHP to fully investigate the costs of maintaining the High Bridge for pedestrian use so that at last the public can legitimately and safely have the magnificent views of the Genesee River gorge that they have sought for years.

Without a doubt, the operational constraints and maintenance costs imposed on Norfolk Southern by the present 133-year old bridge must be addressed to ensure the railroad’s profitability and competitiveness. However, all solutions must be undertaken with keen attention to the visual, historic and recreational impacts and the integral role that the High Bridge plays in the public’s definition of what is Letchworth State Park. We look forward to participating in the environmental review process.

Sincerely,



Robin Dropkin  
Executive Director