



July 17, 2008

New York State Dept. of Transportation
Draft 2008 State Rail Plan
Attn: Bonnie Kring POD-64
50 Wolf Road
Albany, New York 12232

The NYS Department of Transportation is developing a new Rail Plan for the state, the first in 22 years. Parks & Trails New York submitted the following comments on the working draft of this plan.

Dear Ms. Kring:

Parks & Trails New York welcomes the opportunity to comment on the working draft for the 2008 New York State Rail Plan. Parks & Trails New York, representing more than 5,000 members and supporters, is the only statewide not-for-profit 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 around the state.

Our interest in the Rail Plan is based primarily on the potential role that rail corridors can play in connecting people and communities via multi-use trails. Evidence is clear that the presence of trails in and near communities increases the number of people who engage in regular physical activity, thus improving public health, contributes to the local economy, increases property values, and enhances the overall quality of life.

Development of the 2008 NYS Rail Plan comes at a time when several trends and concerns are converging to increase interest in both rail transportation and establishment of trails: unprecedented increases in the price of gasoline and other fuels, chronic health issues associated with physical inactivity (including heart disease, diabetes and obesity), global climate change, and the need for economic development, among others. We believe that the new plan offers an extraordinary opportunity to establish guidelines for better integration of rail corridors with the state's expanding network of multi-use trails, thus contributing to a more comprehensive alternative transportation system and helping to address all of these concerns.

For simplicity, we have listed our comments concisely and in approximately the same sequence as the elements of the working draft to which they relate, making use of the headings in chapter 1. Of necessity, however, some comments refer to several parts of the plan. We will be pleased to discuss them in more detail with your staff if desired.

Our comments all build on a core recommendation: We believe that this plan should address more than rail service/rail transportation. It should recognize and promote the potential of existing rail corridors, active and inactive, to serve both rail and multi-use trail purposes. This can be accomplished with relatively minor wording changes and additions to various goals and other parts of the draft.

Vision

- We suggest titling this section, "2020 Vision for Rail and Corridor Network."
- The Vision itself might read:

NYS DOT's vision for passenger and freight rail service **and rail corridor use** in New York State is centered on improving our environmental sustainability (including energy conservation), **public health**, quality of life, and economic competitiveness, all of which are important to the State, its residents, businesses, and rail stakeholders.

The proposed vision is:

“A system of rail lines and corridors (active and inactive) in New York State that fulfills its potential to contribute to the public health, environmental sustainability, and quality of life while simultaneously supporting and expanding economic development through improved rail freight and passenger services and establishment of multi-use trails.”

- In the following paragraphs, add a third bold element: “**A rail corridor-based multi-use trail network that**” followed by these bulleted items: “Makes maximum use of both inactive and, where safety considerations allow, active corridors for trails;” and “Facilitates non-motorized transportation between and within communities while providing safe, convenient places for healthful physical activity and recreation.”

Safety and security

- We believe that it is important to acknowledge that trails can safely be placed within active rail corridors (rail-with-trail). This could be done by adding to the third objective, “and of trail users within and adjacent to active rail corridors,” and adding a strategy that reads “Ensure use of ‘best practices’ fencing and other safety structures and design where multi-use trails are placed within active rail corridors.”

System preservation

- We support this goal, but would like it to be broadened to include preservation of all corridors, including inactive/abandoned ones, for use as parts of a corridor-based multi-use trail network. The plan should specifically aim not to lose any corridors to non-transportation uses. This could be accomplished by modifying the goal as follows: “Preserve the existing rail transportation system and all intact inactive/abandoned rail corridors as long-term transportation assets.”
- Objectives should include an inventory of all DOT-owned rights-of-way, including inactive ones. We recently worked with a regional office to identify ownership of a corridor in the Clinton area. Research revealed that most of it is DOT-owned.
- Specifically add railbanking as a high priority option for preserving corridors in the long-term. Modify the fourth strategy to read, “... ensure that they are preserved, through railbanking and other appropriate means, for potential future use for rail service or alternative transportation uses.”

Intermodalism, accessibility and mobility

- We are pleased to see bicycle and pedestrian facilities mentioned right at the start of the draft plan as part of the NYS multimodal system. Wherever intermodality is discussed, the plan should specify considering the needs of trail users. For example, in the first strategy under Passenger Strategies, add “accommodating bicycles on all passenger trains, including Amtrak” to the list of ways to improve intermodal connections and seamless integration with local transportation.
- When passenger stations are upgraded, facilities for trail users should be considered (e.g., bike racks, lockers, even showers). You could add appropriate wording to either the fifth or sixth strategy to accomplish this.

Energy efficiency, environmental sustainability, and economic competitiveness

To the first bullet under the objectives (p.12), incorporate “and multi-use trail” into the list of systems that mitigate congestion and reduce energy use.

- In the Passenger Strategies section, modify the second bullet to read “Implement rail feeder bus service *and multi-use trail connections* along existing passenger rail routes.”
- In the Energy and Environmental Strategies section, add trail-oriented development to transit-oriented development at passenger rail stations.

Program funding & delivery

- Add multi-use trails to rail passenger and freight transportation in the bullet about balanced federal investment.

Rail abandonments

- We share the concern about loss of corridors through abandonment and fully support their preservation. Abandonments will continue to some degree, however, and we believe that this section should highlight the important opportunities that exist whenever this occurs to preserve corridors through railbanking or other conversion to multi-use trail routes. In some cases, a conversion to a multi-use trail may yield an equally valuable contribution to local/regional transportation needs. For example, the CP Green Island Branch corridor mentioned in the draft offers the best available option for connecting the Canalway Trail between Cohoes and Albany and meeting a local non-motorized transportation need.
- We believe that this section should mention the important economic benefits that interim trail use can bring to communities along a railbanked corridor that otherwise would sit unused and not making any contribution.
- This section should restate the goal of preventing the loss of any rail corridor, whether through railbanking or purchase by NYSDOT, OPRHP or another state or local agency.
- We recommend that, in order to develop and coordinate courses of action to preserve corridors, the plan call for a clear process of regular, proactive communication between NYSDOT staff, other state and local agencies and trail groups about potential abandonments and other related developments affecting rail corridors (active and inactive).

Other comments

- We believe it is desirable to develop a priority list of rail corridors, active and inactive, that offer the greatest potential for serving, completing or connecting current and proposed trails.
- We recommend that the plan state that when a railbanked corridor supporting a trail is returned to rail service, effort will be made to retain a trail within that corridor. Restoration of rail service does not have to mean the loss of a trail. The plan should recognize that trails have been successfully and safely placed within active rail corridors (rail-with-trail).

Thank you for considering these comments. We would welcome an opportunity to review and discuss them with you in more detail.

Sincerely,



Robin Dropkin
Executive Director