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April 1, 2019

Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

RE: Docket EP 753 – Petition for Rulemaking

Dear Ms. Brown,

These comments, filed on behalf of Parks & Trails New York (PTNY) are in support of a petition by Rails-to-Trails Conservancy (RTC) for the Surface Transportation Board (STB) to establish a one-year period for any initial interim trail use negotiating period and codify the STB's authority to grant extensions of the negotiating period for good cause shown.

PTNY is the leading statewide parks and trails advocacy organization. For over 30 years, the organization has pursued a vision in which all New Yorkers have close access to parks and trails that they can use for recreation and transportation. In addition to serving as a technical resource, PTNY advocates for federal and state-level policies that support the development of these vital spaces. Over its many years in the field, PTNY has witnessed transformation of several railbanked corridors into multi-use trails that enrich communities, including the Erie Cattaraugus Rail Trail and Albany County Helderberg Hudson Rail Trail.

Based on our experience in New York with railbanking negotiations before the STB, we urge the Board to adopt RTC's proposed rule in Docket No. EP 753.

Thank you for your consideration,

Robin Dropkin
Executive Director

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