



246649

ENTERED
Office of Proceedings
October 31, 2018
Part of
Public Record

October 31, 2018

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

RE: Docket EP-749-1: Respectfully Oppose Proposed Rulemaking to Limit NITU's to a Maximum of Six (6) 180-Day Extensions

Dear Ms. Brown,

BikeTexas is the 27-year-old statewide non-profit organization for Texas to advocate for safe infrastructure and safety education for bicyclists and pedestrians of all ages across all part of Texas, especially schoolchildren. BikeTexas enjoys the support of over 20,000 Texans across the state.

BikeTexas (a) respectfully opposes rulemaking to limit review periods for potential rails-to-trails projects, and (b) requests that the STB work closely with the Rails-to-Trails Conservancy (RTC) to find an appropriate review period structure.

BikeTexas bases this request on the following factors.

1. The Texas Legislature and the Office of the Governor have modified the Texas Transportation Code (TTC Section 201.9025) to charge the Texas Department of Transportation (TxDOT) and other state agencies to explore "the development of bicycle tourism trails in this state" that "shall reflect the geography, scenery, history, and cultural diversity of this state", that "shall maximize federal and private sources of funding", and may include "multiuse trails to accommodate equestrians, pedestrians, and other nonmotorized trail users when practicable."
2. Pursuant to this section, TxDOT is currently conducting a contractor study to develop a concept statewide network of Texas bicycle tourism trails for review by the TxDOT Commissioners. This study will be completed by 2020.
3. Studies such as "Walk this Way: The Economic Promise of Walkable Places in Metropolitan Washington, D.C." by the Brookings Institute (May, 2012) reported, in pedestrian-friendly areas, increases in office rent, retail rent, residential rent and residential sales of +38%, +27%, +24% and +39% respectively. Other studies for pedestrian, bicycle and equestrian access confirm this increase.
4. The population of Texas continues to grow rapidly, with projections by the Texas Demographic Center at the University of Texas San Antonio of more than three million new residents by 2040, with about 80% of that increase in about 20 Texas metropolitan counties out of the statewide total of 254 counties.
5. Like roadway systems for motor vehicles, longer and more networked the Texas trail systems provide an exponential increase in the value of the system to pedestrians, bicyclists

and equestrians. RTC has presented evidence that a period of greater than three years is needed to properly develop trails that will serve the area residents and visitors.

6. Texas currently has a number of completed metropolitan and rural rails-to-trails projects to form the foundation for a statewide trail system. The proposed and partially completed 130-mile Northeast Texas Trail (northeasttexasrail.org), running from the Dallas-Fort Worth area to near Texarkana, can and will rival Missouri's cross-state Katy Trail in service to residents and visitors as well as an economic activity generator.

Ms. Brown, *please work closely with the professionals at the RTC* to develop appropriate review-period parameters that work for the local landowners, the trail developers, and the citizens who all can benefit greatly from these trail projects. Please contact me at 512-694-9158 or robin@biketexas.org if I can be of any further assistance.

Thank you for your consideration of this important request.

Sincerely,

A handwritten signature in black ink that reads "ROBIN STALLINGS". The signature is written in a cursive, slightly stylized font.

Robin Stallings
Executive Director

cc: Andrew Dupuy, Manager of Policy Outreach, RTC, Washington, D.C.
Earl Erickson, President, Northeast Texas Trails Association, Paris, TX