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Dear Surface Transportation Board:

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I serve as president of a local park advisory council group to a city park that is adjacent to two active railroad corridors and one abandoned rail corridor, and I would like to address the board's proposed rules changes (EP-749-1).

I started this advisory group earlier this year after I moved into the area and discovered the park was not being well taken care of by the city parks department; basic maintenance on the park was (and still is) not performed. It has taken months in dealing with the parks department to get this local advocacy group officially recognized (the process is still ongoing). What should have been a relatively straightforward procedure has been delayed multiple times for various reasons--some due to meeting scheduling and follow-up and some due to government bureaucracy inefficiencies.

In my brief experience in dealing with the city parks department and city government this year and in observing that government's actions in recent trail projects, I can already see an unfortunate abundance of obstacles inherent in dealing with large organizations and bureaucracies--even those whose goals include creating and stewarding popular public resources like parks (and rail trails are considered here as linear parks, which are increasingly highly prized and promoted in this county by the aforementioned government).

So, in an era when rail trails are increasing in popularity both by the people and its government, one would expect the government (at various levels) to be encouraging rail-banking projects, not looking to make them more difficult to accomplish. What, for instance, is the value or public benefit of seeing a rail-banking project negotiation cease prematurely due to imposing a too-short time limit? Projects like these are complex and often involve legal/government novices (such as myself this year) who are simply trying to improve their communities, and dealing with large organizations and bureaucracies is widely known to involve a number of difficulties already. When projects get to the negotiation stage, for example, one can only imagine how many obstacles already have been overcome. Are more necessary?

Because the benefits of rail trails are many, widely recognized, and would seem to outweigh those of a rail-banking project failing, I ask the STB to reconsider new regulations discouraging the practice at this time, including the rule change to disallow longer negotiating periods for these types of projects. If it can take a large portion of 1 year for a simple local park advocacy group to get to the initial stage of being recognized by a local city government, then it seems reasonable that the negotiation process for a rail-banking project could necessitate a much longer time than 2-3 years.