

Friends of the Souhegan Valley Rail Trail
30 Temple St, Ste 310
Nashua, NH 03060



VIA E-FILING

November 20, 2021

Ms. Cynthia T. Brown
Chief, Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, S.W., Room 1034
Washington, DC 20024

ENTERED
Office of Proceedings
November 23, 2021
Part of
Public Record

Reference Docket No. FD 36472, CSX Corporation and CSX Transportation, Inc., et al. – Control and Merger – Pan Am Systems, Inc., Pan Am Railways, Inc., Boston and Maine Corporation, Maine Central Railroad Company, Northern Railroad, Pan Am Southern LLC, Portland Terminal Company, Springfield Terminal Railway Company, Stony Brook Railroad Company, and Vermont & Massachusetts Railroad Company

Dear Ms. Brown:

The Friends of the Souhegan Valley Rail Trail (FSVRT), a 501(c)(3) non-profit organization in New Hampshire, is providing the following comments regarding the above referenced proceeding.

The FSVRT was formed in 2020 to advocate for the advancement of alternative transportation networks in the Nashua, NH region. This includes establishing a paved, shared-use, active transportation path along the Hillsborough Branch Rail Line, currently owned by Pan Am Railways.

We believe that a change in ownership of the Hillsborough Branch Rail Line presents a once-in-a-generation opportunity to incorporate alternative transportation options into a vitally important transportation corridor that passes through the heart of the Greater Nashua region. We envision a 16 mile rail-with-trail that connects: six communities; 115,000 residents; 3,000 households that don't have access to a vehicle; 63,000 jobs; 68 miles of trails; and 66 parks.

A multi-modal transportation corridor will benefit CSX and the region in many ways:

- Active transportation will stimulate economic activity for CSX, local businesses, and individuals through job creation, business development and increased real estate values.
- Increased transportation options and activity in the corridor would increase public awareness of CSX and result in greater understanding of the importance of rail freight to the economy.
- A fully developed trail will provide CSX with improved access for maintenance vehicles.
- The proposed trail will reduce safety risks posed by those who illegally cross rail lines. By providing a safe, attractive alternative for cyclists and pedestrians, often with fencing between

the pathway and the railway, rails-with-trails effectively eliminate the previous incentive to use the tracks as a shortcut.

- Providing active transportation connections will enhance and expand local transportation networks.

Over the last 20 years, there has been increasing interest in using land adjacent to rail lines for public shared-use paths and trails. A collaborative approach among railroads, trail developers and communities has been used to address safety and liability concerns while allowing trains and trails to coexist. Additionally, statutes in many states, including New Hampshire, provide strong protections for railroads against liability related to the public's use of recreational trails.

This has resulted in the construction of many shared-use pathways, including in CSX Corporation and CSX Transportation, Inc., rights-of-way. In 2002, there were 65 rails-with-trails covering 279 miles, according to the USDOT's 2021 "Rails with Trails Best Practices and Lessons Learned" report. Rails to Trails Conservancy data shows that as of 2021, there are 399+ rails-with-trails in the United States, with more than 1,025 miles located along active railroad corridors.

The Friends of the Souhegan Valley Rail Trail encourages the Board to closely examine the pending Control and Merger request by CSX Corporation and CSX Transportation, Inc., and future filings to ensure that these important regional interests are considered.

Respectfully,

A handwritten signature in black ink, appearing to be "Chris Buchanan", written over a circular stamp or seal.

Christopher Buchanan, on behalf of our board of directors
Chairman
Friends of the Souhegan Valley Rail Trail

Enclosures:

BEFORE THE SURFACE TRANSPORTATION BOARD

STB DOCKET NO. FD 36472,
CSX CORPORATION AND CSX TRANSPORTATION, INC., ET AL.

CONTROL AND MERGER

PAN AM SYSTEMS, INC., PAN AM RAILWAYS, INC., BOSTON AND MAINE CORPORATION, MAINE
CENTRAL RAILROAD COMPANY, NORTHERN RAILROAD, PAN AM SOUTHERN LLC, PORTLAND TERMINAL
COMPANY, SPRINGFIELD TERMINAL RAILWAY COMPANY, STONY BROOK RAILROAD COMPANY, AND
VERMONT& MASSACHUSETTS RAILROAD COMPANY

NOTICE OF INTENT TO COMMENT

The Friends of the Souhegan Valley Rail Trail (FSVRT), a 501(c)(3) non-profit organization in New Hampshire, is providing the following comments regarding the above referenced proceeding.

Dated: November 20, 2021

Respectfully submitted,
Christopher Buchanan, Chairman
Friends of the Souhegan Valley Rail Trail
30 Temple Street, Suite 310
Nashua, NH 03060

CERTIFICATE OF SERVICE

I certify that I have this day served copies of the above Notice of Intent to Comment upon all parties of record in this proceeding, by electronic mail per 49 C.F.R. – 1104.12 upon the following:

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