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EP - 753

Docket EP 753 - Petition for Rulemaking

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Group/Affiliation: Midwest Bikeshare, Inc.

Ms. Cynthia T. Brown

Chief, Section of Administration

Office of Proceedings

Surface Transportation Board

395 E Street, SW

Washington, DC 20423

Dear Ms. Brown

These comments, filed on behalf of Midwest Bikeshare, Inc. 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.

Midwest Bikeshare, Inc. is the nonprofit bikeshare operator in Milwaukee County. We see first hand the importance of trails in our community and to our users. We are also empathetic to how difficult negotiations involving many entities might be, even when there is general alignment in goals and outcomes. To install a bikeshare station can take more than a year based on multiple entities requiring multiple levels of approval, even when all parties want the station. One year would be a much more practical initial negotiating period.

Based on RTC's direct experience with railbanking negotiations before the STB, Midwest Bikeshare urges the Board to adopt RTC's proposed rule in Docket No. EP 753.

Thank you for your consideration,

ENTERED
Office of Proceedings
April 2, 2019
Part of
Public Record

James Davies

Senior Director of Operations and Planning

Midwest Bikeshare, Inc.