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Surface Transportation Board
395 E Street SW
Washington DC 20243
October 29, 2018

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Office of Proceedings
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Public Record

Chairman Ann Begeman and Vice Chair Deb Miller;

As a Rails to Trails Conservancy member, I have biked some spectacular scenery along Washington's Olympic Discovery Trail, areas which are only accessible as a result of STB's role.

The STB proposal to limit the time frame for rail banking between carriers and organizations will detrimentally handicap STB role to support rail to trail projects. Only the sponsor, National Association of Reversionary Property Owners, a nonprofit with a mission to resist government confiscation and a history of actively opposing rail conversion to temporary trail use will benefit.

Under the National Trail System Act, 16 U.S.C. 1247 (d), the STB is the only federal agency whose administrative role is to support carriers to rail bank their corridors which benefits the carriers, our government and generates local economic activity thru increased recreational opportunities.

Per STB reports:

Year	Miles of Railway Abandonment requests	# of Exemption Proceedings	# of Rail Banking agreements	Miles of rail banking
2017	745 miles	34	15	na
2016	337 miles	56	11	110 miles
2015	861 miles	46	18	347 miles
2014	416 miles	39	16	148 miles
2013	601 miles	58	33	240 miles

Many communities have benefited from the important role STB has played in helping to create rails to trails projects. The existing process allows both parties to extend the negotiation time as needed without imposing an artificial endpoint.

Please deny the NARPO proposal.

Sincerely,
Connie J Sandstrom