



**Transportation
for America**

1152 15th Street NW • Suite 450
Washington, DC 20005
Phone: 202-955-5543
www.t4america.org

April 9, 2019

247447

RE: Docket EP 753 – Petition for Rulemaking
Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

ENTERED
Office of Proceedings
April 10, 2019
Part of
Public Record

Dear Ms. Brown,

These comments, filed on behalf of Transportation for America 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.

[Insert your organization's experience with specific railbanked trails here – mention why these trails are so important to the communities they connect, number of users, anything you know about why negotiations may have required extensions and/or why one year would be a more practical initial negotiating period].

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

Thank you for your consideration,

Beth Osborne
Director