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July 11, 2019

Cynthia T. Brown, Chief
Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. AB-1265X – Lehigh Valley Rail Management, LLC –
Abandonment Exemption – In Cambria County, PA

Dear Ms. Brown:

Enclosed is a check for \$300.00 for the filing fee for the Cambria County Conservation and Recreation Authority's Petition to Reopen and Reconsider the Surface Transportation Board's decision on June 25, 2019 and grant a Notice of Interim Trail Use.

Please contact me should you have any questions in this regard.

Respectfully submitted,

RICHARD R. WILSON, P.C.



Richard R. Wilson, Esq.
Attorney for Cambria County Conservation
and Recreation Authority

RRW/bab
Enclosures

FEE RECEIVED
July 17, 2019
SURFACE
TRANSPORTATION BOARD

FILED
July 17, 2019
SURFACE
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July 2, 2019



Cynthia T. Brown, Chief
Section of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. AB-1265X – Lehigh Valley Rail Management, LLC –
Abandonment Exemption – In Cambria County, PA

Dear Ms. Brown:

Enclosed for filing is Cambria County Conservation and Recreation Authority's Petition to Reopen and Reconsider the Surface Transportation Board's decision on June 25, 2019 and grant a Notice of Interim Trail Use.

Please contact me should you have any questions in this regard.

Respectfully submitted,

RICHARD R. WILSON, P.C.

Richard R. Wilson, Esq.
Attorney for Cambria County Conservation
and Recreation Authority

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Enclosures

xc: Eric Hocky, Esq.
Cliff Kitner

BEFORE THE
SURFACE TRANSPORTATION BOARD

LEHIGH VALLEY RAIL MANAGEMENT, LLC –
ABANDONMENT EXEMPTION – IN CAMBRIA COUNTY, PA

DOCKET NO. AB-1265X

PETITION TO REOPEN AND RECONSIDER THE SURFACE TRANSPORTATION
BOARD'S DECISION OF JUNE 25, 2019 AND
GRANT A NOTICE OF INTERIM TRAIL USE

Richard R. Wilson, PC
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July 2, 2019

BEFORE THE
SURFACE TRANSPORTATION BOARD



LEHIGH VALLEY RAIL MANAGEMENT, LLC –
ABANDONMENT EXEMPTION – IN CAMBRIA COUNTY, PA

DOCKET NO. AB-1265X

PETITION TO REOPEN AND RECONSIDER THE SURFACE TRANSPORTATION
BOARD'S DECISION OF JUNE 25, 2019 AND
GRANT A NOTICE OF INTERIM TRAIL USE

On June 25 2019, the Surface Transportation Board served a decision denying the request for issuance for a Notice of Interim Trail Use by Cambria County Conservation and Recreation Authority ("CCCRA") because the Supplemental Notice of Interim Trail Use request submitted by the Authority did not accept full responsibility for all three requirements under the Trail Act and §1152.29(a)(2). In this Petition, CCCRA seeks to correct its Supplemental Notice of Interim Trail Use request to accept full responsibility for all three requirements under the Trails Act and §1152.29(a)(2).

In compliance with 49 C.F.R. 1152.29(a)(2), CCCRA states that it will assume full responsibility for (1) managing the right of way; (2) any legal liability arising out of the transfer or use of the right away and indemnifying the railroad against any potential liability; (3) CCCRA acknowledges that the interim trail use is subject to the continuance

of its obligations under §1152.29(a) and (4) CCCRA recognizes that the trail is subject to possible future reconstruction and reactivation of the right of way for railroad service.¹

In light of these commitments, CCCRA respectfully requests that the Board reopen and reconsider its June 25, 2019 decision and grant CCCRA's request for a Notice of Interim Trail Use in this proceeding.

Respectfully submitted,

Richard R. Wilson, P.C.

A handwritten signature in black ink, appearing to read "Richard R. Wilson", is written over a horizontal line.

Richard R. Wilson, Esq.
Counsel for Cambria County Conservation
and Recreation Authority

¹ CCCRA also submitted a map of the rail line in its Supplemental Notice which was filed by Lehigh Valley in its Environmental Report

VERIFICATION

COMMONWEALTH OF PENNSYLVANIA)

)

COUNTY OF CAMBRIA)

I, Cliff Kitner, Executive Director of Cambria County Conservation and Recreation Authority, swear or affirm and verify that the statements made in the foregoing Petition are true and accurate to the best of my knowledge, information and belief.

7-1-19
DATE

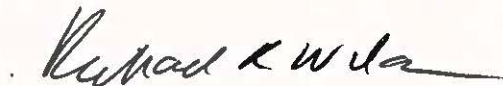

Cliff Kitner, Executive Director
Cambria County Conservation and
Recreation Authority

CERTIFICATE OF SERVICE

I hereby certify that I have this 2nd day of July, 2019 served a copy of the Petition to Reopen and Reconsider the Surface Transportation Board's Decision of June 25, 2019 and Grant a Notice of Interim Trail Use upon the following by first class United States Mail, postage prepaid:

Eric Hocky, Esq.
Clark Hill PLC
One Commerce Square
2005 Market Street, Ste. 1000
Philadelphia, PA 19103

Mr. Clifford Kitner, Executive Director
Cambria County Conservation & Recreation Authority
Cambria County Human Services Building
401 Candlelight Drive, Suite 240
Ebensburg, PA 15931



Richard R. Wilson, Esq.
Counsel for Cambria County Conservation
and Recreation Authority