



Ashtabula – Trumbull – Mahoning – Columbiana – Beaver

GOLRG, PO Box 596, Canfield, OH 44406

"To establish, preserve, and promote a greenway/trail from Lake Erie to the Ohio River for recreation and transportation that will enhance economic development and the quality of life for our region."

CHAIR
Charlie Kohli

November 1, 2018

VICE-CHAIR
Dottie Betz

RE: Docket EP-749-1 – Proposed Rulemaking to Limit NITU's to a Maximum of Six (6) 180-Day Extensions

SECRETARY
Justin Rogers

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

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TREASURER
Dave Ambrose

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Office of Proceedings
November 7, 2018
Part of
Public Record

STEERING
COMMITTEE

ASHTABULA
Terry Berkey
Kevin Grippi
John Keenan
David King
Charlie Kohli
Larrie Puraty

Dear Ms. Brown,

These comments, filed on behalf of the Great Ohio Lake-to-River Greenway Coalition are in opposition to a proposed rule by the STB to require that the number of extensions of the trail use negotiation period not exceed six, or essentially three years.

TRUMBULL
Dave Ambrose
Julie Green
Lily Martuccio
Bud Puskarich
Zachary Svette
Michael Swiatkwich

The purpose of railbanking is to preserve our country's railroad corridors and allow for interim trail use. Railbanking has not only transformed thousands of communities across the country by providing safe public spaces for recreation and transportation, it has also preserved thousands of miles of rail corridors that would otherwise have been abandoned. Assembly of these rights-of-way in modern times would be nearly impossible. Railbanking keeps rail corridors intact.

MAHONING
Justin Rogers
Susan Yerian

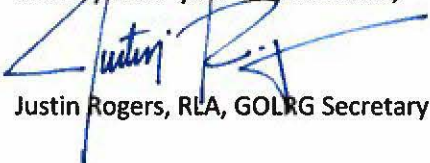
Imposing a 3-year limitation on negotiations would greatly obstruct – and in some cases prevent – railbanking to occur. Per the Rails to Trails Conservancy, of the 393 successfully railbanked corridors, 65 of them took more than 3 years of negotiation between the railroad and the CITU/NITU holder to complete. There are a variety of reasons that negotiations may extend, including: federal and state regulatory processes (environmental assessment, e.g.), the trail manager's ability to secure state or federal funds for acquisition, and appraisal disputes. There is no reason to limit railbanking negotiations. The process of railbanking, including agreement to extend negotiations, is completely voluntary for the railroad. "Reversionary property owners" have available to them means of compensation through this process as well.

COLUMBIANA
Dottie Betz
Tom Butch
Justin Conkle
Dave Goerig
Luke Thompson
Mike West

If the STB were to consider changes related to railbanking negotiations, a suggested improvement would be to change the initial railbanking/interim trail negotiating period to establish a one-year period (instead of 180 days) for any initial and subsequent negotiating periods. From experience in Northeast Ohio, negotiations between railroads and Interim Trail Users almost always extend beyond the short 180-day timeframe, creating additional and unnecessary obstacles for both the railroad and the Interim Trail User.

BEAVER
Doniele Andrus
Sarah Knapp
Nathan Peluso
John Szatkiewicz
Linda Szatkiewicz

Thank you for your consideration,


Justin Rogers, RLA, GOLRG Secretary





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