



**Transportation
for America**

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247454

April 9, 2019

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 11, 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.

Transportation for America is a national nonprofit committed to providing people access, safely and affordably, to jobs and services by multiple means of travel with minimal impact to communities and the environment. A robust trail system is essential to this mission, contributes to community livability and creates economic activity.

Railbanking negotiations usually require more than 180 days to complete due to regulatory, funding and community engagement. Codifying the STB's authority to grant these extensions would match the standard governing extension requests, including in the context of railbanking orders. This proposal would make railbanking as simple and straightforward as possible for trail managers, railroads and the STB, helping to ensure the preservation of rail corridors and promoting the development of rail-trails—all while furthering the statutory language, goals, and articulated public policy of the railbanking law.

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