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Ms. Allison C. Davis
Acting Director
Office of Proceedings
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. EP 749 (Sub-No. 1) – Limiting Extensions of Trail Use Negotiating
Periods; Docket No. EP 753 – Rails-to-Trails Conservancy—Petition for Rulemaking

Dear Ms. Davis:

This firm represents the City of Chicago (City) in connection with the above-captioned proceeding. The City supports the rule modification proposed by the Surface Transportation Board (STB) to:

- establish a one-year period for any initial interim trail use negotiating period, instead of the existing 180 days;
- permit up to three one-year extensions of the negotiating period; and
- permit additional one-year extensions if the trail sponsor and the railroad agree and good cause is shown.

The City believes these changes will aid railroads and prospective interim trail sponsors in negotiating the terms and conditions necessary to a successful railbanking effort, and will reduce any administrative burden on the STB by reducing the frequency of trail use extension requests.

Accordingly, the City urges the Board to adopt the rule modification proposed in the consolidated proceedings in Docket Nos. EP 749 (Sub-No.1) and EP-753. Please do not hesitate to contact me with any questions or if you require further information.

Sincerely,



Allison I. Fultz
Counsel for the City of Chicago