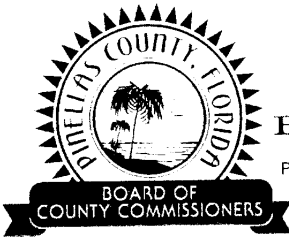


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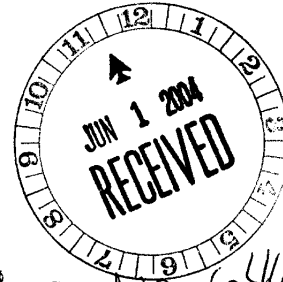
SUSAN LATVALA
CHAIRMAN

PINELLAS COUNTY
BOARD OF COUNTY COMMISSIONERS

PHONE (727) 464-3276 • FAX (727) 464-3022 • 315 COURT STREET • CLEARWATER, FLORIDA 33756

May 20, 2004

Mr. Vernon A. Williams, Secretary
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423



AB-55 SUB-NO. 646X

Dear Mr. Williams:

Pinellas County has just recently become aware of the abandonment procedure step taken by CSX Transportation Inc. concerning a segment of rail line in St. Petersburg. In the attached letter we are documenting our interest in establishing a trail use for that property, as an extension of the Pinellas Trail. We are including the required \$150 application fee as part of our letter. We would however request that the \$150 application fee be waived for our agency. If we are successful through the abandonment procedure and obtain this property, the Pinellas Trail will link the downtown area of St. Petersburg to the rest of the county by way of this multipurpose trail.

Sincerely,

A handwritten signature in cursive script that reads "Susan Latvala".

SUSAN LATVALA
Chairman
Pinellas County Commission

SL/bk

cc: CSX Corporation
Trust for Public Land

ENTERED
Office of Proceedings

JUN 2 - 2004

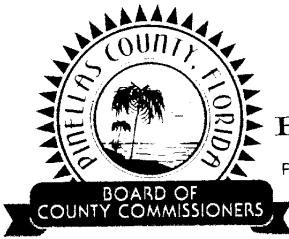
Part of
Public Record

FILING FEE WAIVED

"PINELLAS COUNTY IS AN EQUAL OPPORTUNITY EMPLOYER"



PRINTED ON RECYCLED PAPER



SUSAN LATVALA
CHAIRMAN

PINELLAS COUNTY

BOARD OF COUNTY COMMISSIONERS

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Surface Transportation Board
1925 K Street, NW
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Part of
Public Record

Re: CSX Transportation Inc. Abandonment exemption in Pinellas County, Florida ,
STB Docket Number AB-55(sub number 646X)

Dear Mr. Williams:

This comment should be treated as a protest or a petition for reconsideration in the above-captioned proceeding. This comment is filed on behalf of Pinellas County, Florida, which is a government agency interested in transportation, natural resources, and conservation and recreation, which is hereinafter referred to as "Commenter."

While not taking a position on the merits of this abandonment, Commenter requests issuance of a Public Use Condition as well as a Certificate or Notice of Interim Trail Use rather than an outright abandonment authorization between 34th Street South (US Hwy 19) at milepost SY 893.80 and Martin Luther King Blvd. (9th Street) at milepost SY 895.67.

A. Public Use Condition

Commenter requests the STB to find that this property is suitable for other public use, specifically trail use, and to place the following conditions on the abandonment:

1. An order prohibiting the carrier from disposing of the corridor, other than the tracks, ties and signal equipment, except for public use on reasonable terms. The justification for this condition is that Pinellas County plans to extend the Pinellas Trail through this corridor. Presently the Pinellas Trail, which is a multi-purpose pedestrian bike trail, runs from Tarpon Springs to St. Petersburg, terminating at the western point of the segment in question. The Pinellas Trail was built in the exact corridor which had been previously abandoned by the railroad, this corridor was abandoned in approximately 1984. The Pinellas Trail has a documented trip use of 100,000 trips a month. This segment is indicated on the adopted MPO Plan and Board of County Commissioners Plan (attached) as the extension of the Pinellas Trail. This would tie the existing 47 mile Trail to the downtown area of St. Petersburg. Therefore, installing a trail in this corridor has been a priority of our County since the Pinellas Trail was first constructed in 1990. The time period sought is 180 days from the effective date of the abandonment authorization. Commenter needs this much time because implementing actions need to be defined between Pinellas County and the City of St. Petersburg with the intent to accomplish this Rails to Trails conversion.

2. An order barring removal or destruction of potential trail-related structures such as bridges, trestles, culverts and tunnels. The justification for this condition is that these structures have considerable value for recreational trail purposes. The time period requested is 180 days from the effective date of the abandonment authorization for the same reason as indicated above.

B. Interim Trail Use

The railroad right-of-way in this proceeding is suitable for railbanking. In addition to the public use conditions sought above, Commenter also makes the following request:

"PINELLAS COUNTY IS AN EQUAL OPPORTUNITY EMPLOYER"



PRINTED ON RECYCLED PAPER

Mr. Vernon A. Williams
May 20, 2004
Page 2

STATEMENT OF WILLINGNESS
TO ASSUME FINANCIAL RESPONSIBILITY

In order to establish interim trail use and railbanking under section 8(d) of the National Trails System Act, 16 U.S.C. § 1247(d), and 49 C.F.R. § 1152.29, Pinellas County is willing to assume full responsibility for management of, for any legal liability arising out of the transfer or use of (unless the user is immune from liability, in which case it need only indemnify the railroad against any potential liability), and for the payment of any and all taxes that may be levied or assessed against the right-of-way owned by CSX Transportation Inc. and operated by CSX Transportation Inc.

The property, known as the downtown extension, extends from railroad milepost SY893.80 near 34th Street South (US Hwy 19), to railroad milepost SY 895.67, near Martin Luther King Blvd. (9th Street) a distance of 1.85 miles in Pinellas County, Florida. The right-of-way is part of a line of railroad proposed for abandonment in STB Docket No. AB-55 (Sub-no. 646X).

A map depicting the right-of-way is attached.

Pinellas County acknowledges that use of the right-of-way is subject to the user's continuing to meet its responsibilities described above and subject to possible future reconstruction and reactivation of the right-of-way for rail service.

By my signature below, I certify service upon CSX, Jonathan C. Gold, 500 Water Street, J150 Jacksonville, FL 32202, by US Mail, postage pre-paid, first class, this 18th day of May, 2004.

Sincerely,



SUSAN LATVALA
Chairman
Pinellas County Commission

SL/bk

cc: CSX Corporation
Trust for Public Land
Attachments

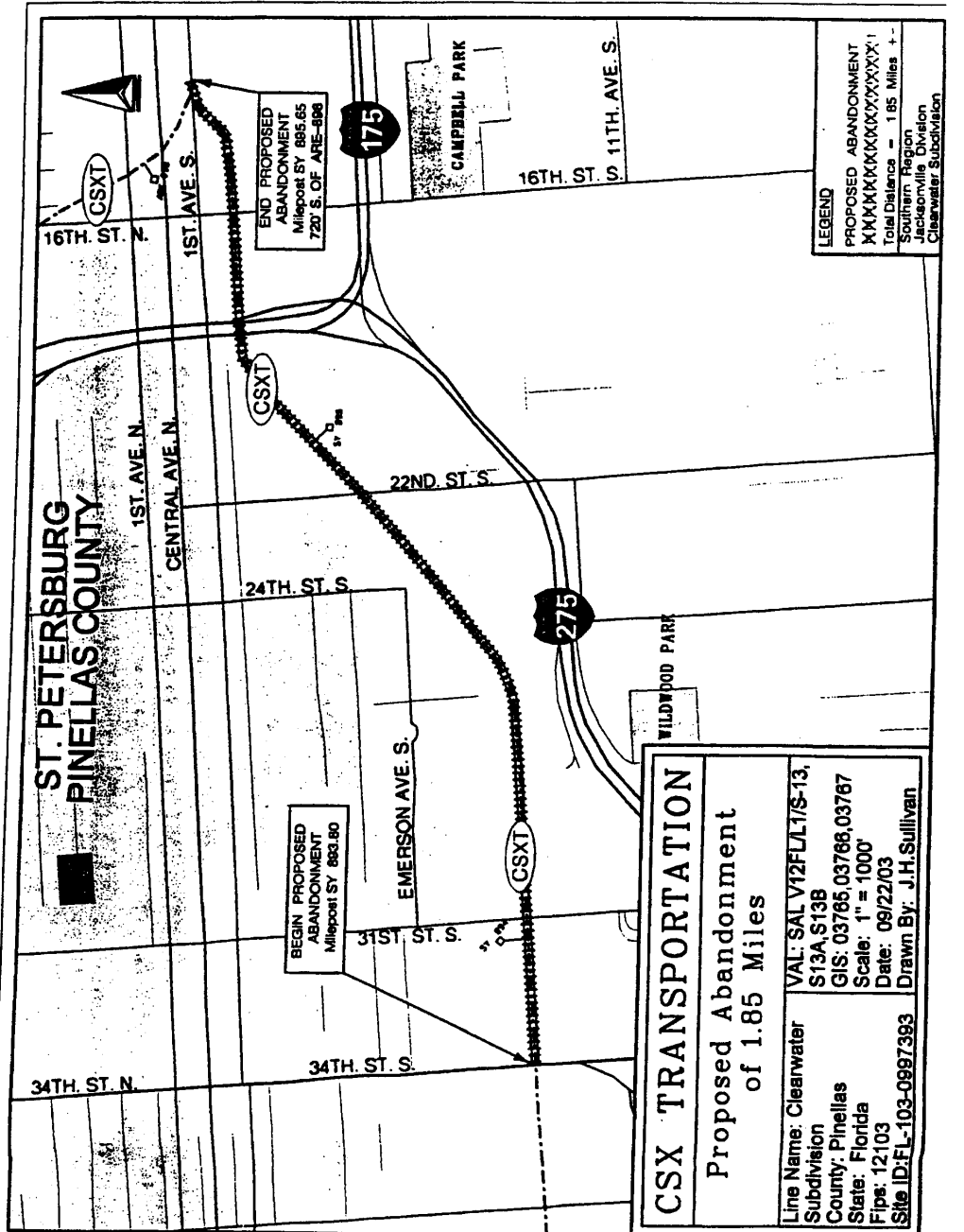
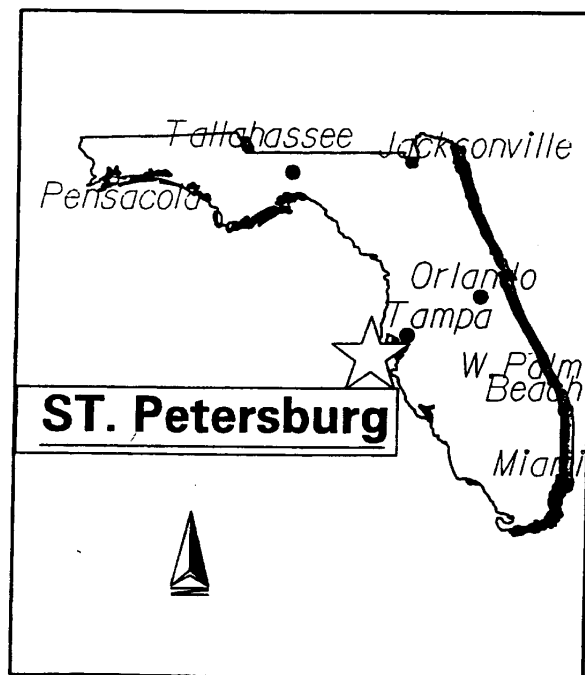


Exhibit A



**AREA MAP
STATE OF FLORIDA**

**Proposed Abandonment - 1.85 Miles
Pinellas County
St. Petersburg, Florida**

SOUTHERN REGION - JACKSONVILLE DIVISION - CLEARWATER SUBDIVISION

