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Cynthia T. Brown
Surface Transportation Board
395 "E" Street, NW
Washington, D.C. 20423

Before the Surface Transportation Board

National Association of Reversionary Property Owners- Petition for a Rulemaking (Ex Parte 749)
Limiting Extension of Trail Use Negotiation Periods (Ex Parte 749) (Sub-no. 1)

Iowa Natural Heritage Foundation works with cities, counties and nonprofits across the state of Iowa to develop multi-use trails. We have been involved with all major rails-to-trails conversions in Iowa since the adoption of the National Trails System Act's amendment to Section 8(d) establishing railbanking.

Rails-to-trails development are some of the most complex projects we undertake. It can take years to coordinate with a railroad company and government entities while securing appropriate permits, contracts and funding needed to preserve these corridors and develop them for public use.

The ultimate goal for both the railroad companies we work with and ourselves is to protect these corridors in perpetuity for transportation purposes. We have seen the difficulty to recreate cross-county utilities in the recent past. The proposed rulemaking only serves to complicate this effort which was also the ultimate intention of railbanking.

Furthermore, Iowa Natural Heritage Foundation is in complete support of the comments filed by Charles H. Montange on behalf of Madison County Mass Transit District and Iowa Natural Heritage Foundation. His comments effectively capture the legal precedent that illustrates the lack of foundation needed to limit railbanking negotiations.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Joe McGovern", with a long, sweeping horizontal line extending to the right.

Joe McGovern
President

