

LAW OFFICES OF  
**LOUIS E. GITOMER, LLC**

LOUIS E. GITOMER  
[Lou@lgrailaw.com](mailto:Lou@lgrailaw.com)

MELANIE B. YASBIN  
[Melanie@lgrailaw.com](mailto:Melanie@lgrailaw.com)  
410-296-2205

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600 BALTIMORE AVENUE,  
SUITE 301  
TOWSON, MARYLAND 21204-4022  
(410) 296-2250 \* (202) 466-6532  
FAX (410) 332-0885

September 15, 2020

Ms. Cynthia T. Brown  
Chief of the Section of Administration, Office of Proceedings  
Surface Transportation Board  
395 E Street, S.W.  
Washington, D. C. 20423

RE: Docket No. AB-55 (Sub-No. 763X) *CSX Transportation, Inc.—Abandonment  
Exemption—in Logan County, WV*

Dear Ms. Brown:

The Georgetown and High Line Railway Company, LLC, (“GHLR”) files this letter in response to the comments filed by NARPO on September 11, 2020, asserting that Surface Transportation Board (the “Board”) should cancel the requested extension of the Notice of Interim Trail Use (“NITU”) because it does not comply with *Limiting Extensions of Trail Use Negotiating Periods*, STB Docket No. EP-749( Sub-No. 1) (STB served December 4, 2019) (“*Limiting Extensions*”). NARPO is wrong and is applying the incorrect timeframe to the GHLR request.

Under *Limiting Extensions*, the Board clarified that “parties engaged in negotiations under an existing CITU or NITU that was originally issued before February 2, 2017, may request one additional extension of one year, beyond the four-year anniversary of the issuance of the CITU or NITU, without showing extraordinary circumstances.” Slip Op. at 11. The initial NITU was issued by the Board on October 26, 2016. See *Decision of Notice and Interim Trail Use, CSX Transportation, Inc.—Abandonment Exemption—in Logan County, WV*, STB Docket No. AB-55 (Sub-No. 763X) (STB served October 26, 2016). Five years from the initial NITU is October 26, 2021. Under *Limiting Extensions*, GHLR is entitled to ask for an NITU extension until October 26, 2021, without showing extraordinary circumstances.

The Board has found that GHLR is a legitimate entity and NARPO’s assertion to the contrary is an attempt to reassert a position that the Board has dismissed.

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GHLR respectfully requests that the Board deny NARPO's request and grant the extension of the negotiation period.

Thank you for your assistance. If you have any questions, please contact me.

Sincerely yours,



Melanie B. Yasbin  
Attorney for Georgetown and High Line  
Railway Company, LLC

cc: Steve Armbrust – CSXT  
Richard Welch-NARPO