

**W. Thomas Logan
Post Office Drawer 279
Beaufort, South Carolina
29901**

July 7, 2009

The Honorable Anne K. Quinlan, Esq.
Secretary
Surface Transportation Board
395 E. Street, SW
Washington DC, 20024

Re: Board Meeting of July 8, 2009 to Evaluate the History of
Rails to Trails as an Effective Means of Rail Banking; EP_690_0

Dear Ms. Quinlan:

I understand this letter comes to you at the eleventh hour, and can only hope you will find a way to have the Board consider the views I express here.

I would like to offer three points:

First, because the structures installed both above and below ground pursuant to any non-rail use (e.g. Rails to Trails, Paths Connect, the placement of water and sewer infrastructure) proposed as an interim measure to facilitate rail banking inevitably will impact the cost and thus the likelihood of reestablishing rail service over those ROWs so converted, the STB should establish guidelines which will assure that such cost increases as may be expected to result from dealing with these non-rail structures in the course of reestablishing rail service will be minimal and that those increased costs will be objectively quantified and passed along to the entities responsible for the non-rail use.

Second, I am given to understand that of some 1,596 conversions so far overseen by the STB, only nine projects have returned to rail service. If this is so, the STB should undertake to discover why the preferred outcome of Rail Banking is so seldom the actual outcome. In particular, an effort should be made to determine the extent to which local champions of non-rail uses of these projects stand in the way of

reconverting these rights of way to their highest and best use: as railway corridors.

Third, the extent to which alternate uses of the banked rights-of-way are subsidized by the taxpayer should be examined and made a part of the review process. The subsidy to be expected should be made highly specific and an effort should be undertaken to level the playing field by promoting legislation which would require that rail use options be subsidized to at least – AT LEAST – the same extent of non-rail alternatives.

Thanking you again for your help in having my opinion heard by the Board, and with kindest regards, I remain

W. Thomas Logan