

# MULLINS LAW GROUP PLLC

Transportation Solutions for the 21<sup>st</sup> Century

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December 13, 2024

309004

## VIA E-FILING

Cynthia T. Brown  
Chief of the Section of Administration  
Office of Proceedings  
Surface Transportation Board  
395 E Street, SW  
Washington DC 20423-0001

ENTERED  
Office of Proceedings  
December 13, 2024  
Part of  
Public Record

Re: Norfolk Southern Railway Company – Abandonment Exemption – In Henderson and Polk Counties, North Carolina, and Greenville and Spartanburg Counties, South Carolina, AB-290 (Sub-No. 415X)

Dear Ms. Brown:

On December 2, 2024, the Saluda Grade Trails Conservancy filed a petition for the issuance of a Notice of Interim Trail Use (“NITU”) to allow the Saluda Grade Trails Conservancy to engage in negotiations with Norfolk Southern Railway Company (“NSR”) toward a possible trails use arrangement for the approximately 31.3-mile rail line, extending from approximately Milepost W 26.0 +/- to approximately Milepost W 57.3 +/- (the “Line”) in the Counties of Henderson and Polk in North Carolina and the Counties of Greenville and Spartanburg in South Carolina.

NSR was served a copy of the Saluda Grade Trails Conservancy request.<sup>1</sup> NSR hereby notifies the Board that consistent with the City’s December 2<sup>nd</sup> filing, it does not object to the issuance of a NITU and is willing to engage in negotiations toward a possible trails use arrangement for the Line.

Sincerely,

**/s/ Crystal M. Zorbaugh**

Crystal M. Zorbaugh  
Attorney for Norfolk Southern Railway Company

cc: R. Glenn Hilliard  
Parties of Record

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<sup>1</sup> Per the regulations in 49 CFR § 1152.27, the railroad’s reply is generally due 10 days after the NITU is filed. As stated in the request for a NITU, NSR has been in negotiations with the Saluda Grade Trails Conservancy towards instituting trail use for the Line and has not yet consummated the abandonment. NSR respectfully requests that the Board issue the requested NITU.