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To Whom It May Concern:

I am submitting a formal opposition statement in regards to Docket FD 36918; 900 Conshohocken Rail LLC's intent to acquire an approximately 11-mile rail line in Conshohocken, Pa. from Cleveland-Cliffs Railways Inc. (Upper Merion & Plymouth Railroad).

MLP Ventures' proposes to **remove** railroad track and rights-of-way of the Upper Merion & Plymouth Railroad ("**UMP**"), in operation since July 9th, 1907, for parking lots on portions of the Cleveland-Cliffs steel mill property in Plymouth Township for a proposed hyperscale data center. Combined, these parking lots would boast upwards of 2000 spaces. This is unnecessary mismanagement of infrastructure to build massive parking lots at the expense of vital rail infrastructure when a majority of those spaces will sit unused.

Removal of the right-of-way approach to the Schuylkill River bridge, where the UMP interchanges with Norfolk Southern across the river in Upper Merion Township, is also part of this plan. Effectively, this cuts off the mill property from the national rail network, as well as multiple businesses and an 11 track yard on the east side of Conshohocken Road. For this reason, we believe MLP's parking plan hinders interstate commerce, preventing prospective customers wishing to ship freight by rail, therefore forcing reliance onto trucks on already congested roadways. By keeping this connection intact, prospective customers are able to locate along the UMP and ship by rail.

Additionally, while the UMP is included in the steel mill site transaction, I firmly believe MLP Ventures is uniquely unqualified to operate a railroad of any kind. Their real estate background does NOT include ANY railroad operations experience. This unique and historic railroad, in operation for nearly 120 years, deserves an owner-operator who is experienced in the rail industry and will **grow** its freight business, not maintain status quo, or worse, shut it down. It would be most helpful to see any plans, if any, that MLP Ventures has to grow the UMP's customer base beyond its sole customer, Coopers Creek Chemical Corporation, located in Swedeland.

For the reasons listed above, I wholeheartedly oppose this transaction and encourage the STB to revoke this petition.

Respectfully Submitted,

-Mike Huhn
(Career railroader for over 15 years)
CC: Parties of Record