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Public Record

Saturday, October 31, 2026
VIA ELECTRONIC FILING

Ms. Cynthia T. Brown
Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001

Re: Docket No. FD 36918
900 Conshohocken Rail LLC – Acquisition and Operation
Exemption – Rail Line of Cleveland-Cliffs Railways Inc.
d/b/a Upper Merion & Plymouth Railroad

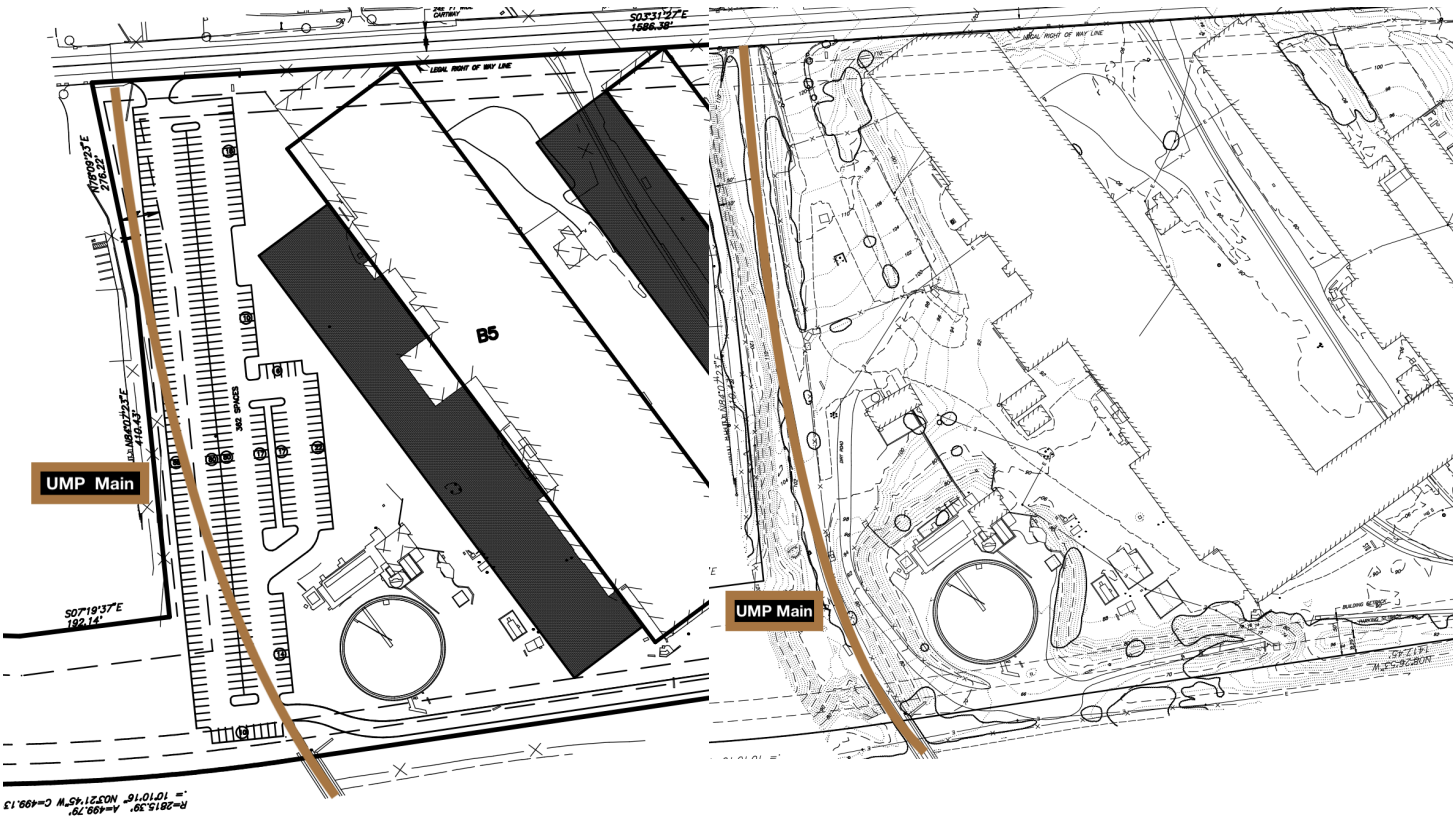
Dear Ms. Brown,

I renew my opposition 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). While I appreciate the response on behalf of the applicant, 900 Conshohoken Rail LLC, there are still unanswered questions regarding my concerns and respectfully provide my rebuttal to their response.

In my original opposition statement:

"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….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….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."

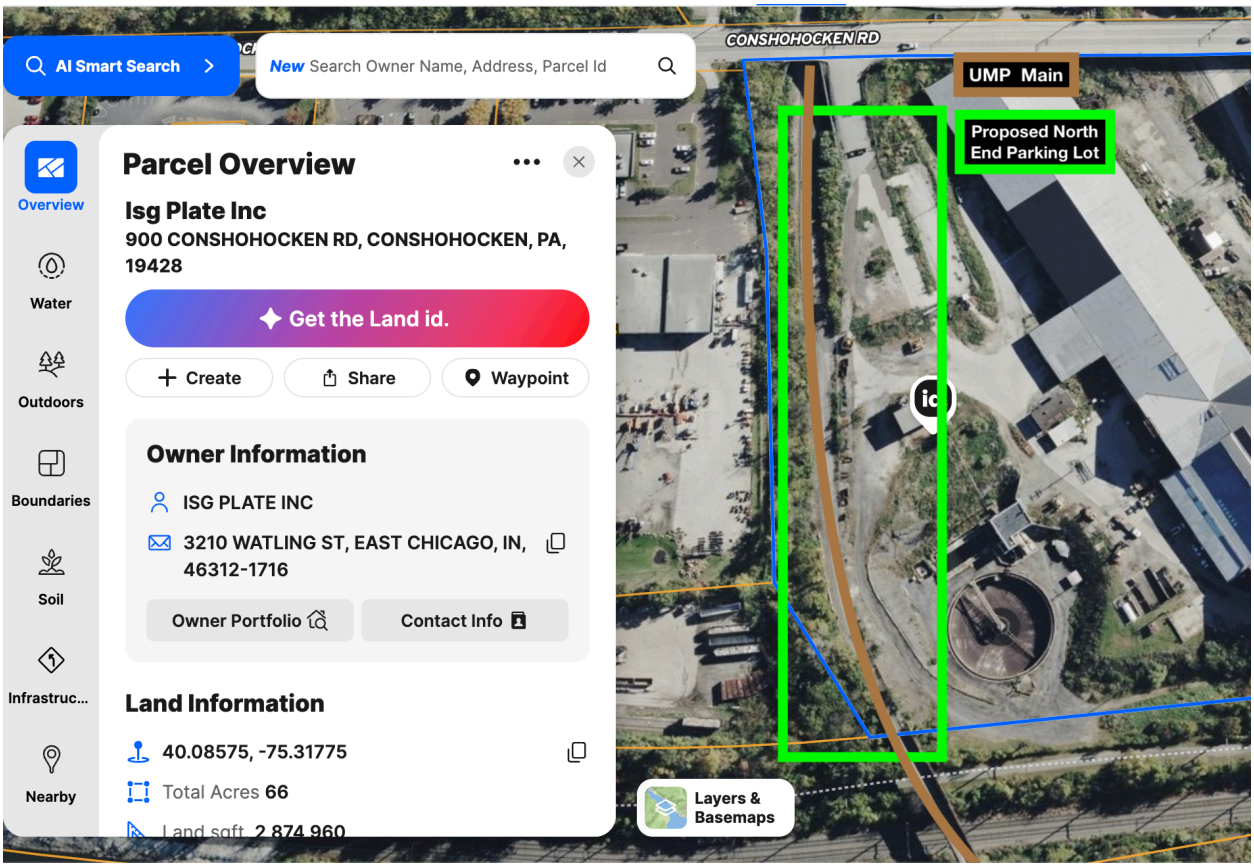
I would like to enter the following examples of material into the record:



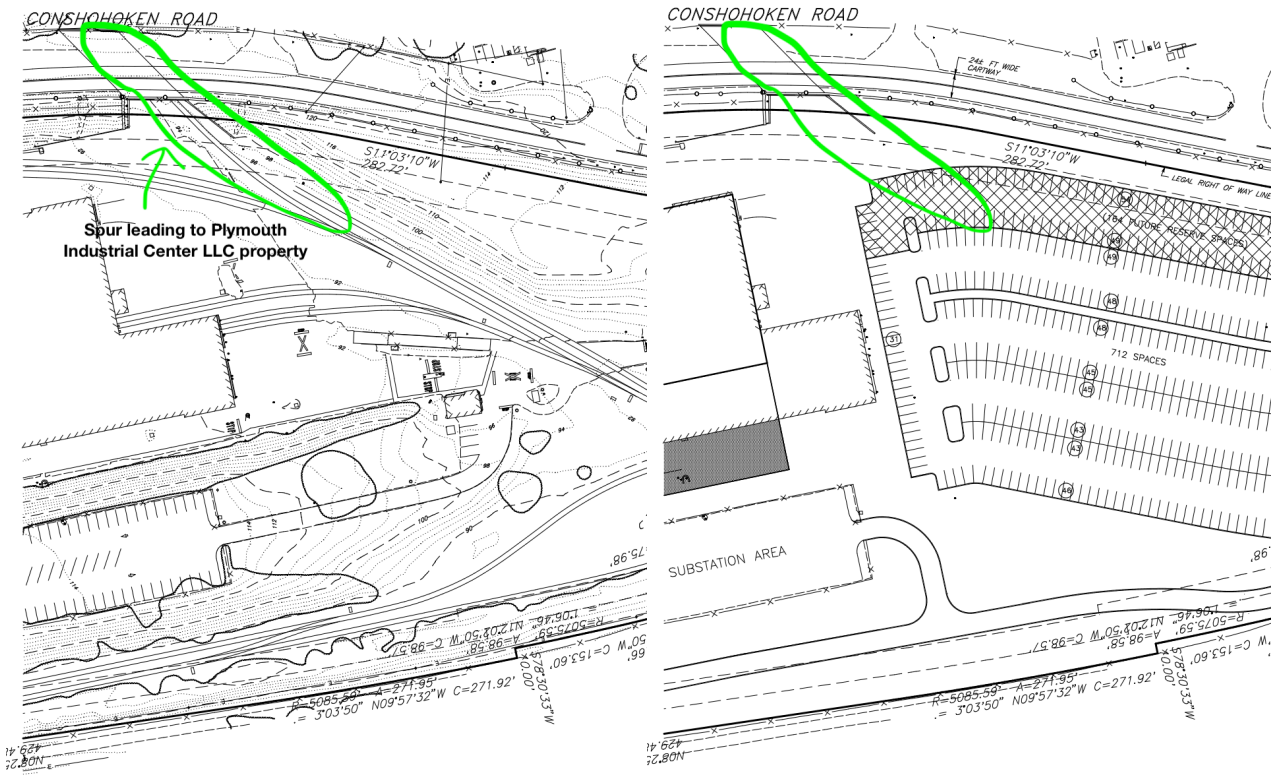
These schematic maps, taken from Page 17 (left) and 23 (right) of “2026_04_28 – Application – 900 Conshohocken Road – Special Exception”, shows a proposed 362 space parking lot on the property’s northern end as provided to Plymouth Township’s Zoning Hearing Board from the applicant’s civil engineer. Page 17 provides the proposed concept, and Page 23 shows existing conditions. The applicant’s attorney stated on October 28th that **“Conshohocken Rail anticipates removal of certain unneeded ancillary tracks in connection with the redevelopment of the steel mill property by the related entity. Such activity will not sever or adversely affect the regulated trackage extending from the vicinity of the steel mill site across the Schuykill River to the connection with Norfolk Southern Railway Company."**

At the bottom of each map is the bridge where the UMP Line crosses the Schuylkill River to access the Norfolk Southern interchange in Swedeland. The proposed parking facility as depicted on Page 17 will directly impact the UMP Line, resulting in removal of a portion of the UMP Line’s main track and right-of-way. This conflict depicted in each diagram is ***merely one example*** of the conflict between Conshohocken Rail’s actual plans for the property and the existing rail rights-of-way, and contradicts the above statement from the applicant.

For this reason, we believe this portion of the applicant’s plan hinders interstate commerce, preventing a prospective customer’s ability to ship freight by rail.



This LandID aerial view shows the same location in close conformity with the civil engineer's schematic, and provides a different perspective and overview of the northern end of the potentially affected section of UMP Line main track.



From Pages 26 (left) and 22 (right) of “2026_04_28 – Application – 900 Conshohocken Road – Special Exception”, shows a proposed 712 space parking lot on the property’s southern end as provided to Plymouth Township from the applicant’s civil engineer, which includes a reserve 184 space addition. Page 26 shows existing conditions and Page 23 provides the proposed concept. The majority of the track removal the applicant’s plan calls for is located on this portion of the property. A spur, circled in both schematics, leads to Plymouth Industrial Center LLC’s property, who has made its intentions known to ship by rail. Removal of this spur would hinder PIC’s rail shipping options and provide less flexibility for rail use on their property.

This document can be reviewed in its entirety on Plymouth Township’s website: https://www.plymouthtownship.org/download/Citizen%20Boards/zoning_hearing_board/2026/applications/900-Conshohocken-Road-Application.pdf



As stated in the applicant's response letter: **"Many of those ancillary tracks served the former steel mill and are no longer needed now that the mill has permanently closed."** While not entirely inaccurate, certain tracks still serve an active need. As shown in this picture from Binswager (sourced from an online property listing: https://www.loopnet.com/Listing/Industrial-Redevelopment-Opportunity/38374142/), the UMP currently stores its motive power on the mill property when not in use, which is monitored by 24/7 security. Other freight cars may still reside on the property and would be switched as needed.

To conclude, as stated in the applicant's response letter, **"Conshohocken Rail expressly indicated, however, that rail operations as needed would be undertaken by a contract service provider if not performed by Conshohocken Rail itself. Conshohocken Rail Notice of Exemption at 3, n.5."** However, in my professional opinion, this statement is far too broad and generalized in nature. Conshohocken Rail's explanations on October 28th do not reflect its stated plans to other governmental entities, and I respectfully request that the STB take any action it deems appropriate in light of the apparent discrepancies.

Additionally, I renew my request for ***specific*** plans from the applicant for maintaining the existing level of service, attracting new line-side customers, or otherwise.

Respectfully submitted,



-Mike Huhn

CC: Thomas J. Litwiler

David E. Benz

Karyn A. Booth