

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

ENTERED
Office of Proceedings
January 16, 2018
Part of
Public Record

STB Docket No. AB-1258

**ALLOY PROPERTY COMPANY, LLC – ADVERSE ABANDONMENT – CHICAGO
TERMINAL RAILROAD IN CHICAGO, IL**

**CHICAGO TERMINAL RAILROAD COMPANY’S REPLY TO ALLOY PROPERTY
COMPANY, LLC’S APPLICATION FOR ADVERSE ABANDONMENT**

The Chicago Terminal Railroad Company (“CTM”) does not oppose the Application for Adverse Abandonment (“Application”) filed by Alloy Property Company, LLC (“Alloy”) in the above-captioned case on October 11, 2017. Alloy’s Application seeks abandonment of CTM’s authority to operate over portions of CTM’s lines in Chicago, Illinois beginning at the western right-of-way line of North Elston Avenue and proceeding east and south to Goose Island (the “Line”).¹

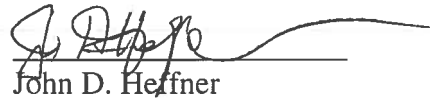
CTM and Alloy have recently entered into discussions likely to result in an amicable resolution of their disputes about the status of the Line. In furtherance of those discussions, CTM does not now and will not in the future oppose the Application and agrees that the public convenience and necessity support abandonment of the Line. CTM does not contest the evidence Alloy presented in the Application that there is no need for rail transportation service along the Line, including Alloy’s evidence that no carloads of revenue traffic have moved over the Line since May 14, 2015 and that there are no reasonable prospects for developing future rail traffic over the Line.

¹ See Application for Adverse Abandonment, *Alloy Property Co., LLC – Adverse Abandonment – Chicago Terminal R.R. in Chicago, IL*, STB AB Docket No. 1258 (filed October 11, 2017) (“Application”).

To the extent that CTM previously made statements indicating its intent to oppose the Application, CTM hereby irrevocably withdraws those statements. In particular, CTM withdraws the statements made in its reply to Alloy's petition for waiver.²

In addition, the City of Chicago noted in its October 18, 2017 letter supporting the Application that the City may be filing a request for interim trail use. If the City were to file such a request, CTM is willing to negotiate an interim trail use agreement.

Respectfully submitted,



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Date: January 16, 2018

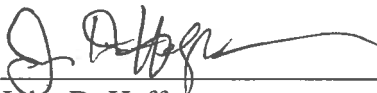
² See Reply of Chicago Terminal Railroad to Petition for Partial Waiver of Abandonment Regulations and for Exemption, *Alloy Property Co., LLC – Adverse Abandonment – Chicago Terminal R.R. in Chicago, IL*, STB Docket No. AB 1258 (filed June 21, 2017).

CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2018, I caused the foregoing Reply to Alloy's Application for Adverse Abandonment to be served by first class mail or more expedient method upon the following:

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