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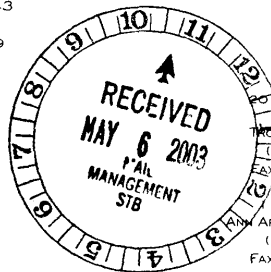
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VIA FEDERAL EXPRESS

Mr. Vernon A. Williams
Secretary
Surface Transportation Board
Room 700, 1925 K Street, N.W.
Washington, D.C. 20423

PERTAINS TO CONFERENCE
SCHEDULED FOR MAY 9, 2003

207744

Re: Riverview Trenton Railroad Company; petition for an exemption from
49 U.S.C. 10901 to acquire and operate a rail line in Wayne County, MI;
STB Finance Docket No. 34040

Dear Mr. Williams:

We represent Grosse Ile Bridge Company (GIBC), the immediate northerly neighbor of the property on which Riverview Trenton Railroad Company (RTR) proposes to operate a railroad and develop an intermodal terminal for rail, road and river traffic. As pointed out in more detail in a letter submitted to the Board by our client on March 9, 2002, GIBC owns and operates a toll bridge (Bridge) connecting the residential island community of Grosse Ile to the mainland. The Bridge is one of just two bridges from the mainland to Grosse Ile, which together are the only means by which the 11,000 residents of Grosse Ile can obtain vehicular access to the mainland. The Bridge is a swing bridge that must be opened when barge or vessel passages occur, and is unavailable to the residents of Grosse Ile during such times.

We write in support of the request by the City of Riverview that this Board order that a supplemental Environmental Assessment be conducted.

The prior environmental assessment did not consider the effect of RTR's future waterborne transportation on the residents of Grosse Ile, or on the Bridge. The assessment did not consider the impact of (1) more frequent or extended blockages of Bridge traffic if RTR's anticipated operations increased the number or duration of Bridge openings due to barge or boat traffic, or (2) RTR's potential interference with the Bridge operation if RTR attempts to claim or exercise as a "railroad" powers of eminent domain to take or interfere with the approaches to or other property of the Bridge. Both possibilities should be considered, as they could result in depriving nearly 11,000 citizens of one of their two means of vehicular access to the mainland, and the only means during periods of maintenance or closure of the County bridge.

This is not, as RTR's April 25, 2003 filing disparagingly characterizes the widespread governmental opposition to RTR's petition, a "not in my backyard" opposition based on general distaste for railroad operations. Rather, it is a request that the Board require that the environmental assessment consider the question of whether RTR's proposed operations and eminent domain powers

Mr. Vernon A. Williams, Secretary
May 5, 2003
Page 2

could deprive Grosse Ile's residents of essential access to their homes. The loss of one of the two bridges could be harmful to the welfare of Grosse Ile's residents, who rely on mainland hospitals, ambulances, and other essential emergency services, and who commute daily to jobs on the mainland, all of which are dependent on reliable vehicular access.

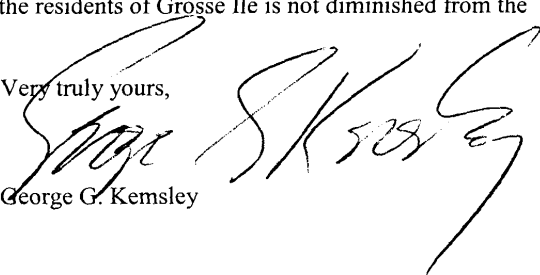
We recognize that the Board and the environmental section have previously said that the issues raised by RTR's proposed use of the waterfront are somewhat speculative. We respectfully disagree, for the reasons pointed out by Riverview. The question is not whether, but when and to what extent. In any event, the impact of depriving 11,000 island residents of their access to the mainland would have such extreme consequences that some degree of speculation should be tolerated in determining whether RTR's petition should be granted, and on what conditions.

We are aware that the Board on May 2, 2003 scheduled the captioned proceeding for discussion and possible decision on May 9, 2003. However, we could not have written sooner in support of the City of Riverview's motion. We were not even aware of Riverview's motion until May 1, 2003, when we received a service copy of RTR's April 25, 2003 reply.

For the above reasons, we strongly urge the Board to deny or postpone decision on RTR's petition, and instead to order that a supplemental Environmental Assessment be conducted of the impact of anticipated expansion of its proposed operation by planned future waterborne transportation, including specific inquiries into the potential impact on the citizens of Grosse Ile and the continued viability of the Bridge owned and operated by GIBC.

Alternatively, on behalf of GIBC, we would request that the Board condition any order allowing RTR's petition on an undertaking by RTR to so conduct its present and future activities as to assure that the availability of the Bridge for the residents of Grosse Ile is not diminished from the present level.

Very truly yours,


George G. Kemsley

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