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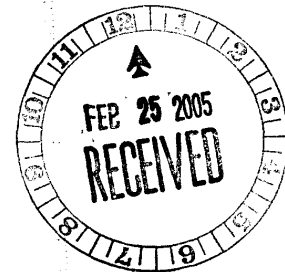
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Secretary
Section of Environmental Analysis
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423

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FEB 24 2005

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Public Record



Re: Comment: STB Docket No. AB-792X, *Railroad Switching Service of Missouri, Inc.* -
Abandonment Exemption - Entire Rail Line in St. Louis City, St. Louis County, Missouri

Dear Madam or Sir:

This letter is in response to a letter dated December 22, 2004 from Mr. Thomas F. McFarland, attorney for Railroad Switching Service of Missouri, Inc. (RSSM), informing the City of St. Louis (City) of RSSM's intent to file an application for abandonment on or about January 11, 2005. Mr. McFarland requested the City to comment on the proposed abandonment of the rail line located partially within the boundaries of the City. Pursuant to 49 C.F.R. § 1152.25(a)(1), the City wishes to comment on the above-referenced application for abandonment as a public use condition under 49 U.S.C. § 10905 (Section 1152.28 of the STB's rules).

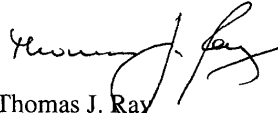
As briefly summarized in section 5 of RSSM's Historic Report, the City acquired said rail line from Norfolk and Western Railway Company (predecessor to the Norfolk Southern Corporation) in 1989. The City subsequently leased the line to RSSM, an affiliate of Ironhorse Resources, Inc. The City sold the rail line to Ironhorse Resources, Inc. in a Quit Claim Deed on August 31, 1999.

Subject to the Surface Transportation Board's (STB) approval of RSSM's application for abandonment, the City requests the STB to grant the City an option to acquire all or part of said rail line. It is the position of the City that the rail line in whole or part may be appropriate for use for public purposes as outlined in 49 U.S.C. § 10905, "including highways, other forms of mass transportation, conservation, energy production or transmission, or recreation." The property under and adjacent to the existing rail line is, and will continue to be, central to the City's present and any proposed public redevelopment plan in the coming years.

In summation, should the STB approve RSSM's application for abandonment, the City asks the STB to instruct RSSM to enter into talks with the City to sell all or part of said rail line to the City, as the rail line may be appropriate for other public purposes.

Thank you for your attention to this matter.

Very truly yours,


Thomas J. Ray
Deputy City Counselor

CERTIFICATE OF SERVICE

Copy of the foregoing mailed this 18th day of February, 2005 to Thomas F. McFarland, Esq., 208 South LaSalle Street, Suite 1890, Chicago, IL 60604-1112.

