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May 9, 2007



VIA HAND DELIVERY

Honorable Vernon A. Williams
Secretary
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423-0001

**Re: Finance Docket No. 34040, Riverview Trenton Railroad Company –
Petition for Exemption from 49 U.S.C. 10901 to Acquire and Operate
a Rail Line in Wayne County, MI**

Dear Secretary Williams,

Enclosed please find the original and ten copies of the Reply of Riverview Trenton Railroad Company to the City of Riverview's Petition to Revoke. Please date stamp the extra copy and return it with our messenger.

Sincerely,

David H. Coburn
Attorney for Riverview Trenton
Railroad Company

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MAY 9 2007
U.S. DEPT. OF TRANSPORTATION

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 34040

**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**

**RIVERVIEW TRENTON RAILROAD COMPANY'S REPLY TO
THE CITY OF RIVERVIEW'S PETITION TO REVOKE**

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Public Record**

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**Attorneys for Riverview Trenton
Railroad Company**

May 9, 2007

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 34040

**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**

**REPLY OF RIVERVIEW TRENTON RAILROAD COMPANY
TO THE CITY OF RIVERVIEW'S PETITION TO REVOKE**

On March 22, 2007, the City of Riverview ("Riverview") filed a Petition to Revoke the exemption granted by this Board to Riverview Trenton Railroad Company ("RTRR") on May 15, 2003 in the above captioned proceeding. Riverview does not seek revocation because it has identified some alternative use for the property (which it does not own) or because RTRR's rail status is preventing the City from enforcing some specifically identified law or other requirement applicable to RTRR. Nor is this a proceeding in which some entity is seeking to use rail status as a means of conducting transportation or other activities outside the purview of some regulatory scheme. Rather, as has been the case from the outset of RTRR's request for an exemption to acquire and operate a line of railroad, Riverview simply does not want rail operations on the RTRR line or an intermodal transportation facility on RTRR's property. In this Reply to Riverview's Petition to Revoke, RTRR will address in detail why Riverview has not even come close to meeting its burden of showing that the exemption at issue should be revoked.¹

¹ RTRR's Reply initially was due on April 11, 2007, but the Board granted RTRR's unopposed petition for an extension of time to May 9, 2007.

BACKGROUND

In a decision served May 15, 2003, the Surface Transportation Board granted RTRR's Petition for Exemption to acquire and operate a line of railroad in Wayne County, MI. In its Petition for Exemption, RTRR sought authority to operate over 1.5 miles of rail line on its own 76-acre property and via easement over track within an adjacent 195.45-acre industrial site owned by Detroit Steel Center, Ltd. ("DSC") over which DSC at that time intended to move its own traffic. Both parcels of land were previously owned by the McLouth Steel Company which used the track to service its plant. RTRR stated in its Petition that it proposed to establish an intermodal terminal involving rail, motor and, possibly in the future, barge traffic to serve a range of shippers and to transport DSC's traffic.² RTRR proposed to interchange traffic with other Class I railroads. RTRR would be able to do so through a switch at the south end of its property, near a grade-separated crossing over Jefferson Ave. In addition, RTRR also has available to it a rail connection at the northern end of its property. At the northern end, the RTRR line crosses Jefferson Ave. at grade. Upon RTRR's application, Michigan DOT has since approved the crossing of Jefferson Ave. by RTRR trains, subject to the installation of designated crossing protection devices.³

RTRR's Petition was opposed by Wayne County, MI, the Cities of Trenton and Riverview, MI and, at least initially, by the Grand Trunk Western Railroad ("GTW")⁴ The local

² DSC's steel plant on the site is not operational to date. DSC is in the process of attempting to sell its remaining steel operations in the area. The steel facility proximate to RTRR's line remains a potential customer

³ That MDOT approval was issued on May 8, 2006 and requires that crossing work at the north end crossing of Jefferson Ave. be completed within 24 months of that date. Riverview's contention at page 7 of its Petition to Revoke that the north end crossing is not scheduled to be opened for at least two years is simply not correct

⁴ GTW joined in the opposition statement filed by Wayne County, alleging that the Board lacked jurisdiction over the track which they characterized as exempt spur or industrial track, and

governments argued that local desires to eliminate rail use of the property and eventually put the property to as yet undefined and unfunded recreational or other "quality of life" uses should take precedence in determining whether the proposed exemption was consistent with the rail transportation policy. The Board, however, correctly noted that its "statutory responsibility is to look at the transportation merits of the RTRR's proposal." May 15, 2003 Decision, slip op. at 7. In its assessment of the transportation merits, the Board found that RTRR's proposed operations on its line and related intermodal facility "is a legitimate rail transportation project, which should be allowed to go forward." *Id.* at 8. It further found that not only was regulation of the transaction not needed to carry out the national Rail Transportation Policy ("RTP") of 49 U.S.C. §10101, but that the transaction would promote many of the individual goals set out in the subsections of the RTP. *Id.* at 8. Further, the Board noted that the Environmental Assessment ("EA") prepared by the Board's Section of Economic Analysis ("SEA") confirmed that the exemption would not significantly affect the quality of the human environment. *Id.* Finally, the Board held that regulation of RTRR's entry into the railroad business is not necessary to protect shippers from abuse of market power. *Id.* at 9.

The Board specifically noted that it was granting the Petition for Exemption because the statutory criteria for exemption had been met. However, in light of the concerns expressed by the local communities, the Board reserved oversight jurisdiction for three years and required RTRR to submit status reports every six months during that period advising the Board of its progress in implementing its project. *Id.* at 9.

expressing concern that RTRR's operation might interfere operationally with GTW's operations in the area. The Board soundly rejected the opposition's jurisdictional arguments (May 15 Decision, slip op. at 5-7) and further found that "the rail transportation policy provides no grounds for denial of the exemption to meet GTW's concern" which the Board pointed out was unsupported by any evidence. *Id.* at 8. RTRR has since reached an agreement with GTW's parent, CN, concerning the maintenance of the south end switch

In accordance with the Board's Decision, RTRR submitted six status reports, the last of which was filed on May 15, 2006. On March 22, 2007, Riverview filed a petition to revoke the exemption, claiming that RTRR's status reports offered no specifics and do not refute "the City of Riverview's contention that RTRR invoked STB jurisdiction for the primary purpose of usurping local government regulation" . . . and that "RTRR may have no intention to conduct rail operations on the site." Petition to Revoke at 9.

Riverview's contentions are based on pure speculation and have no merit. Significantly, Riverview's Petition to Revoke included as exhibits five of the six status reports, but failed to include or even summarize the Fifth Status Report filed on November 15, 2005 ("Fifth Report"). The Fifth Report explicitly stated the steps that had been undertaken and accomplished, those that were underway or in the planning stages, and the circumstances that had impeded RTRR's progress. In addition to the specific environmental and construction impediments reported by RTRR, over the past few years there has been a well-documented decline in economic activity in the Detroit area and the entire state of Michigan that has seriously eroded the current demand for expanded rail service of the type RTRR would provide in the area at this time. As described more fully in the verified statement of RTRR witness Thomas Christ, attached to this Reply, Detroit and particularly the auto industry in Detroit, has been especially hard hit by the economic decline. As a result, RTRR's own plans have suffered a temporary setback. However, RTRR is confident that the auto industry and other industries in the Detroit area will revive and RTRR intends to be ready, willing and able to meet the new demands for rail service that inevitably will accompany the economic resuscitation.⁵ RTRR believes, and demonstrated in this proceeding,

⁵ RTRR envisions that a healthy percentage of its traffic will be generated by the automobile industry. See, e.g., March 7, 2002 Verified Statement of Richard P. Urban, submitted as part of RTRR's March 7, 2002 Response to the Board's request for supplemental evidence in this proceeding ("*Urban Statement*"). Mr. Urban explains how RTRR could serve as a vital transportation resource for the auto industry.

that its 76-acre property with its connections to three main lines is ideally situated for an intermodal/rail loading facility as it is able to provide truck, rail and barge service as needed and thus to play an integral role in revitalizing the economic health of the region. *Verified Statement of Thomas Christ ("Christ V.S.")* at 8.⁶

Riverview's contentions that RTRR invoked STB jurisdiction only to avoid unspecified local regulations and that RTRR has no intention of providing rail service are wrong. The first contention was thoroughly refuted in the exemption proceedings. RTRR demonstrated that its plans for the use of the property as an intermodal facility were initiated and well known to the local communities before those communities began to develop alternatives for non-industrial use of the land – uses which to this day remain undefined, unfunded and highly unlikely to materialize.⁷ In any event, Riverview's Petition cites no local regulations that RTRR might be seeking to avoid and presents no evidence of an alternative use that would provide any public benefits, let alone benefits sufficient to force the abandonment of RTRR's promising rail line and related facility. Riverview's second contention – that RTRR has no intention to provide rail service -- has no basis whatsoever. RTRR fully expects to provide intermodal service when Detroit's economy improves, as it inevitably will.

As discussed more fully below, Riverview's contentions lack merit and do not meet the legal criteria for revocation of an exemption. Therefore, Riverview's petition should be denied. Moreover, Riverview's petition to revoke RTRR's authorization to provide rail service in conjunction with the operation of a rail loading facility is, in essence, a request for adverse

⁶ RTRR explained in detail in prior pleadings how the property is ideally situated to provide this service. See *Urban Statement. Verified Statements of David Wilson and John MacGregor*, both submitted as part of RTRR's March 7, 2002 Response to the Board's request for supplemental evidence in this proceeding (explaining the unique benefits of RTRR's location.)

⁷ See *RTRR Reply*, filed in this docket on January 30, 2002, at 9-15

abandonment of the RTRR rail line Riverview clearly has not met the burden to show that the public convenience and necessity require or permit the forced abandonment of RTRR's rail line

ARGUMENT

I. RIVERVIEW HAS NOT MET THE LEGAL CRITERIA FOR REVOCATION

Under 49 U.S.C. § 10502(d), the Board may revoke an exemption, in whole or in part, if it finds that regulation of a transaction is necessary to carry out the Rail Transportation Policy of 49 U.S.C. § 10101. Under this statute, the Board must evaluate the revocation petition to see if regulation is needed. The party seeking revocation has the burden of proof, and petitions to revoke must be based on reasonable, specific concerns addressing the need for regulation. *New York New Jersey Rail LLC and New York Cross Harbor Railroad Terminal Corp – Corporate Family Transaction Exemption*, STB Finance Docket No 34813 (served Dec. 8, 2006) (citing *Minnesota Comm Ry Inc. – Trackage Exempt – BN RR. Co.*, 8 .C.C.2d 31, 135 (1991)) See also, *Wisconsin Central Ltd. – Exemption Acquisition and Operation – Certain Lines of Soo Line Railroad Company*, Finance Docket No 31102 (ICC served July 28, 1998), *I&M Rail Link LLC – Acquisition and Operation Exemption – Certain Lines of Soo Line Railroad Company*, STB Finance Docket No 33326 et al (STB served Apr. 2, 1997).

The Board may also revoke an exemption if necessary to protect the integrity of its processes. A party challenging the bona fides of a transaction must show that the grant or use of the exemption was inconsistent with the RTP or a clear abuse of the Board's procedures. *SF&L Railway Inc – Acquisition and Operation Exemption – Toledo Peoria and Western Railway, etc ("SFL")*, STB Finance Docket Nos. 33995 and 33996 (STB served Oct 17, 2002) (conduct after acquisition was deliberate deterioration of service in order to justify abandonment); *The Land Conservancy of Seattle and King County – Acquisition and Operation Exemption – The*

Burlington Northern and Santa Fe Railway Company ("King County"), 2 S T B 673 (1997)
(acquisition was for the sole purpose of salvaging the line).

As discussed in the subsections below, Riverview has not met the requirements of 49 U.S.C. 10502(d) nor has it shown any abuse of the Board's processes

A. Riverview Has Not Shown That RTRR's Exemption is Inconsistent with the Goals of the Rail Transportation Policy or That Regulation of the Transaction Is Warranted As Required by 49 U.S.C. § 10502(d)

Riverview's Petition to Revoke does not even attempt to address the statutory requirements for the revocation of an exemption under 49 U.S.C. §10502(d). Rather, Riverview's Petition hinges entirely on the Board's statement that it will entertain requests to reopen and revisit this matter "should it become clear . . . that RTRR is not following through on the representations it has made in this proceeding regarding the development of rail service on this property." Petition at 2, citing Board's May 15 Decision at 13, Exhibit 1. The crux of Riverview's petition is that RTRR has not yet completed the rehabilitation of the track structure and therefore has not yet begun operating its rail line. Riverview also alleges that RTRR has failed to adhere to the Board's imposed environmental conditions. It then jumps to the conclusion that RTRR has no intent to provide rail service and therefore its authorization to do so should be revoked.

However, Riverview fails to provide any evidence that supports these conclusions. Its evidence consists only of a selection of excerpts from five of the six status reports filed by RTRR, to which Riverview attaches its summary conclusions, -- e.g., "this report is vague," "no names of companies contacted are provided," "fails to describe any plan," "contains a lot of 'talking', but . . . no action" (Petition at 4, 5, and 6) -- and a collection of photographs purporting to demonstrate the lack of development on the property. Petition, Exhibit 7.

Riverview's "evidence" does not meet its burden of proving by the articulation of reasonable and specific concerns that regulation is necessary to carry out the RTP. In fact, Riverview does not even address the RTP provisions cited by the Board as being advanced by the transaction. Nor does Riverview allege any actions on RTRR's part that are inconsistent with the RTP or that would warrant regulation of the transaction. As the Board noted in its Decision, the exemption was granted because the proposed operation of a rail line and intermodal facility were consistent with the RTP and that this proposed rail activity met the criteria for exemption. In order to revoke an exemption where those criteria were met, the party seeking a revocation of the exemption has the burden to show otherwise. Riverview, however, makes absolutely no effort to do so.

B. Riverview Has Failed to Show That RTRR Has Abused the Board's Processes

Riverview's Petition to Revoke also fails to meet the Board's stated grounds for revisiting the issue – i.e., that it should "become clear that RTRR is not following through on its representations." The Board's continued oversight jurisdiction was in response to local government allegations that RTRR was using the Board's processes solely as a means to circumvent otherwise applicable government regulation of its property. But while RTRR acknowledges that it has not yet begun to provide rail service, that in itself is not sufficient to demonstrate an abuse of the Board's processes. Riverview has offered no evidence that RTRR is not following through on its representations, that its original plans were merely a sham, or that RTRR has no interest in providing service in the future. Nor does Riverview identify any local regulation that RTRR is avoiding or identify any way in which Riverview is being prejudiced by RTRR's retention of an exemption to operate its line.

To the contrary, while RTRR acknowledges that the economic decline in the Detroit area has made it difficult for RTRR to go forward on the schedule originally anticipated, RTRR has

not abandoned the rail project and should not be forced to abandon its line. *Christ V S* at 8 In its exemption petition, RTRR represented that it would rehabilitate the track, enter into plans with other carriers to provide interchange service, and eventually commence rail operations using connections at one or both ends of the property. *RTRR's Petition for Exemption* at 6 RTRR still intends to do so.

1. RTRR's Actions to Date are Consistent With the Representations and Purposes Stated in the Exemption Petition

Riverview alleges that RTRR has not followed through on its representations, but that allegation is not supported by the facts. As noted, Riverview summarizes and includes as exhibits only five of the six reports filed by RTRR. The Fifth Report, which Riverview omitted, described the progress to date, as well as specific obstacles that were impeding progress. In that report, RTRR affirmatively stated that it had entered into an agreement with Canadian National for the maintenance of the connection on the south end of RTRR's property (Fifth Report at 2); had completed a new business plan, and had held initial discussions with officials of other railroads. *Id.* at 5-6. RTRR also reported that a thorough study of the property undertaken to determine the extent of the required track rehabilitation also revealed the persistent presence of water and a high level pH on certain portions of the property sufficiently caustic to result in unusually high deterioration of ties. RTRR reported that it had hired TMH Environmental, LLC to address those problems. *Id.* at 2-4. In addition, in the Fifth Report, RTRR explained that the connection on the north end would be needed to mobilize the necessary materials and machinery for the rehabilitation, but that certain remediation would have to be completed at that end before the track could be re-laid. *Id.* at 3. Finally, RTRR explained that the track rehabilitation at the south end had been delayed by the DSC's demolition of the old McLouth Steel Company buildings, which required the use of heavy trucks traversing over the easement road bed.

Because of the on-going use of and damage to the tracks, the tracks were unserviceable and could not be rehabilitated until the demolition was complete. *Id*

Contrary to Riverview's allegations, the Fifth Report provided names and details (as did RTRR's other status reports). These positive accomplishments and the ongoing impediments to further progress were ignored in Riverview's Petition to Revoke, even though as noted in the Report, Riverview was apprised of these events in a meeting initiated by RTRR on October 25, 2005 *Id* at 5.

RTRR has taken reasonable and prudent steps toward the rehabilitation of the track and the necessary preparations for rail service. As Mr. Christ explains, RTRR believed it would have been imprudent to invest significant sums in its project while the judicial review of the STB's decision granting its exemption remained pending. That judicial review was not resolved by the U.S. Court of Appeals for the Sixth Circuit until February 10, 2005, effectively putting a hold on RTRR's plans for about 21 months from the date of the STB's May 2003 decision granting RTRR's exemption. *City of Riverview, et al, v STB*, 398 F.3d 434 (6th Cir , 2005).

Since that time, other factors have impaired progress, but progress has been made. Over the course of several months, DSC's demolition of the old McLouth Steel Company buildings effectively prevented track rehabilitation efforts. However, that demolition in the area of the easement track now has been completed. This has allowed for the track on the easement property over which RTRR proposes to operate trains to be rehabilitated and in fact that rehabilitation has now been done by DSC, consistent with its obligations under the easement agreement⁸ *Christ I'S* at 5. While additional rehabilitation of the ties will be needed in the

⁸ Various side tracks on the DSC property which were not part of the line over which RTRR will operate have been removed by DSC

future. the track currently is in suitable condition for mobilization of equipment and materials for operation of trains to support the planned rail facility.

RTRR has taken other preparatory steps to ensure that it can move forward at the appropriate time. For example, as Mr. Christ explains,

- RTRR has already entered into an agreement with Canadian National for the maintenance of the track and switch at the south end connection and CN is currently performing those tasks.
- RTRR has already applied for and obtained the necessary authorization from MDOT to reopen the at-grade crossing of Jefferson Ave. on the north end of the RTRR property
- RTRR has taken steps to identify the source of the water leakage and caustic contamination on the north end, and to determine the extent and cost of remediation, and that project is still ongoing.
- RTRR has developed business plans for the RTRR operation which it will refine and implement as economic conditions warrant.

Christ V.S. at 5-6

Mr Christ also points out that RTRR has recently received a request, reflected in an April 9, 2007 letter attached to his Statement, to delay work on the north end connection from the Wayne County Department of Public Services. Specifically, that agency has asked RTRR to refrain from installing new rail and initiating rail service across Jefferson until the repairs to the southern vehicular bridge to Grosse Ile are completed. The County contends that this is necessary to prevent additional traffic congestion to and from the island during construction as all vehicular traffic is being routed to the only other bridge, which is located only 200 yards from the north end connection to be rehabilitated. *Christ V.S. at 6-7* The County further contemplates that RTRR be given an extension by MDOT of its ability to install a new crossing until September 2008 in view of the Grosse Ile bridge situation. RTRR is in the process of evaluating the County's letter, but anticipates that there will be some further delay in the work needed to open the north end connection. *Id. at 7*

The actions that RTRR has taken to date are intended to prepare the property and position RTRR for the provision of rail service in response to demand. As discussed below, and more fully in Mr. Christ's statement, the sequence and prioritization of projects have been reasonable business decisions made in the face of the challenging economic conditions in Detroit in general, and, particularly with respect to the auto industry that RTRR anticipated serving. *Christ V S* at 5.

2. Changing Economic Conditions Beyond RTRR's Control Have Caused Further Delay

A significant impediment to the development of RTRR's proposed rail facility is the dramatic change in the economic conditions of the Detroit area. When RTRR filed its petition for exemption, it had high expectations of capturing some of the auto industry's business. As Mr. Christ explains in his statement, since the time RTRR envisioned the rail line and facility and petitioned for authorization from the Board to become a rail carrier, the auto industry has suffered serious and well-known reversals. According to data in *Ward's Motor Vehicle Facts & Figures*,⁹ the Michigan production of passenger cars declined by approximately 36 percent between 2000 and 2005. Even with an offsetting 5 percent increase in light truck production, the total Michigan vehicle production for that period decreased 19.1 percent, and *Automotive News 2007 Market Data* shows an additional 9.4 percent reduction between 2005 and 2006, for a total 26.7 percent decline in Michigan production of motor vehicles. *Christ V S* at 7-8 and Exhibits TC-3 and TC-4. The big three auto makers, Chrysler, Ford and General Motors, have all experienced substantial decreases in the production of cars, and even with increases in light truck production, their total 2005 production figures show declines from 2000 levels. Chrysler had

⁹ Data from *Ward's Motor Vehicle Facts & Figures* 2001, 2002, 2003, 2004, 2005, and 2006 and *Ward's Automotive News 2007 Market Data* (April 2, 2007) were collected and analyzed. See *Christ V.S. and Exhibits TC-3 and TC-4*

declines in both car production (2.5 percent) and truck production (9.5 percent) and its 2005 total vehicle production was 7.6 percent lower than in 2000. Ford's total vehicle production was down 39.3 percent, which reflects its 64.2 percent decline in passenger cars being offset somewhat by a 14.3 percent increase in light truck production in the 2000 to 2005 period. General Motors' ("GM") passenger car production decreased 44.7 percent. But even though its 2005 truck production was 18.7 percent higher than in 2000, GM's total vehicle production decreased by 25.1% from 2000 to 2005. Comparable figures for US production show that Michigan, and primarily Detroit, has been hit harder than average. For the country as a whole, total car production declined 22.0 percent, truck production increased 5.5 percent, and the total US vehicle production declined only 6.5 percent between 2000 and 2005. As a result of the economic troubles in the Detroit auto industry, RTRR has had to modify its business plan to reflect these new economic and marketing realities. *Id.*

Nonetheless, RTRR is confident that Detroit, and particularly the big three automakers, will make an economic comeback. RTRR not only anticipates that it will benefit from the future economic revival, but fully intends to be an active participant in bringing it about. RTRR has a strategically advantageous position for meeting the new demands. Its 76-acre property is well situated to provide a rail loading facility that physically connects to three main rail lines and has ready access to truck and barge lines as well. Moreover, when improvement in the economy materializes, RTRR will have already completed the preliminary work on the site and will be positioned to make rapid progress in completing the facility when economic opportunities are ripe. *Christ VS* at 8

3. Riverview's Contentions That RTRR Never Intended and Does Not Now Intend to Provide Rail Service As Authorized by the Exemption Are Without Merit and Do Not Support Allegations of Abuse of Process

Riverview contends that because it can demonstrate that RTRR has not completed its plans for intermodal service, it therefore has shown that RTRR never intended and does not now intend to provide such service. But that is wrong. Riverview is well aware of the economic situation that confronts RTRR and other new development in the Detroit area. These economic developments, which are completely beyond RTRR's control, should not be used to impute false motives to RTRR's petition for exemption to acquire and operate the rail line. Riverview has submitted no evidence that would support an allegation of an abuse of the Board's processes.

A finding of abuse would require a showing that RTRR had deliberately used the Board's exemption proceedings to achieve a purpose that was inconsistent with the purpose for which it obtained the exemption. For example, in *King County*, the petitioner sought an exemption to acquire a rail line under the Offer of Financial Assistance ("OFA") provisions of 49 U.S.C. § 10904, which allows a party to acquire a line that is no longer profitable for the incumbent railroad in order to preserve rail service for existing or potential shippers in the future. An OFA entails a commitment to continue existing service or actively pursue business. Within weeks of obtaining the exemption, the petitioner sought to abandon the line and salvage the track. The Board revoked the transaction upon finding that the sole purpose for filing the OFA was to preclude a rails-to-trails application, in order to acquire the line for salvage purposes.

In *SFL*, the petitioner acquired a line that connected to another carrier whose traffic fed the acquired line. The petitioner purchased the line except for a short segment that connected with the second carrier, thus making it impossible to continue rail service. The Board found this was a deliberate deterioration of service and that the petitioner's sole purpose in acquiring the line was to salvage the track materials and thus was an abuse of the Board's procedures.

Unlike the grantees in *King County* and *SFL*, RTRR is not taking deliberate actions to undermine the purpose for which the exemption was granted. Rather, as shown above, RTRR's

actions are fully consistent with its stated purpose in acquiring the line and seeking authority to operate over it

Moreover, Riverview's contention that RTRR sought operating authority from the Board solely to avoid local regulation is belied by the fact that Riverview has failed to identify what regulation is being avoided or to offer credible alternative uses for the property. The property was and remains zoned for industrial use and the local governments acknowledged in the prior proceedings that there were no immediate plans at that time to condemn the property.¹⁰ (In fact, it was Wayne County that had at one time taken some initial steps to take the property under eminent domain. However, RTRR is not aware of any interest on the part of the County to pursue such efforts at this time, and Riverview has not identified any taking plans or, to RTRR's knowledge, budgeted for such plans.)

In short, Riverview has not provided any new evidence of a viable alternative use, nor of any budgeted projects or pending local government action that have been or could be hindered by RTRR's current and proposed use of the property that RTRR owns. While RTRR's progress has been slower than anticipated, its actions to date are not inconsistent with its proposed use of the land for rail service, for which it is ideally suited. And since Riverview has no alternative proposed use, there is no benefit in revoking the exemption -- RTRR will still own the property as it does now regardless of whether it is able to conduct rail operations on it. Thus, revocation would seriously harm RTRR and future rail operations while providing no countervailing advantage to Riverview.¹¹

¹⁰ See e.g., *RTRR Reply filed January 30, 2002 at 9-15*

¹¹ It should be noted that although Wayne County and the City of Trenton, MI, also initially opposed the transaction in the STB proceedings and on appeal, neither of those parties has joined Riverview in this petition for revocation.

Riverview's contention that "... RTRR may have no intention to conduct rail operations on the site" is based solely on its observation that the rehabilitation of the tracks has not been completed and service has not yet commenced. But, as discussed above, delay in the development of rail service does not prove lack of intent; it only proves that RTRR has made a reasonable business judgment in light of other factors described above and current economic circumstances. As Mr. Christ explains in his statement, it is an indisputable fact that circumstances largely beyond RTRR's control -- including the lengthy litigation that followed the Board's decision -- have been major impediments to RTRR's progress. *Christ V S* at 6-7

Riverview's further allegations that RTRR has not beautified the property nor complied with the Board's environmental conditions have no merit. It clearly would make no sense for RTRR to landscape the property only to have the landscaping destroyed during the remediation and rehabilitation activities. Further, until rail operations commence, RTRR is not obligated to comply with the berm and landscaping environmental conditions imposed by the Board's May 15, 2003 decision as these are rail noise mitigation conditions. Riverview seems to want RTRR to comply with these conditions even though it doesn't want any rail operations. Its position in that regard is untenable.

Moreover, RTRR's property -- while admittedly not a garden -- is maintained consistent with the local regulations and is comparable to surrounding vacant lands. RTRR acknowledges that it is subject to reasonable and non-discriminatory health and safety requirements and maintains the property consistent with those requirements.

4. Riverview Is Not Harmed By RTRR's Delay

Riverview has not offered any reasonable, specific concerns as to any harm actually sustained or likely to be sustained by Riverview as a result of slower than anticipated

development of the rail line and an intermodal facility¹² In fact, Riverview's main objection has always been that it does not want the property used for rail operations Thus, RTRR's delay does not impose any hardship on Riverview. Most of Riverview's specific objections go to the "unsightliness" of the property. But as noted above, Riverview does not have any plans for alternative development of the property, which appears little different from other industrial properties in the area

While it would be pointless for RTRR to expend large sums of money to beautify the property at this time, RTRR will comply with the Board's environmental conditions when remediation of the land and construction of the facility are complete. In the meantime, RTRR will continue to maintain the property consistent with the City of Riverview's own property maintenance regulations. *Christ V S at 9*

Riverview has not demonstrated that regulation is necessary to carry out the RTP or that the Board's processes have been abused by any actions taken by RTRR to date At best, Riverview can show only that, due to circumstances beyond its control, RTRR's completion of its plans has been delayed Riverview, however, has not shown that it has suffered any harm from that delay. Thus, Riverview clearly has not met the criteria for revocation and its petition should be denied

II. RIVERVIEW'S PETITION FOR REVOCATION IS TANTAMOUNT TO A REQUEST FOR ADVERSE ABANDONMENT WHICH IS INCONSISTENT WITH PRECEDENT AND WITH THE GOALS OF THE RTP

Riverview's petition to revoke RTRR's authority to provide rail service is the functional equivalent of a request for adverse abandonment of the rail line But Riverview's evidence in this case clearly does not meet the standard for such a ruling. Under 49 U.S.C. §10903(d), the

¹² Most of Riverview's photographs and their descriptions purport to show that the property is unsightly, but allege no particular harm

standard governing any application to abandon or discontinue service over a line of railroad, including an adverse abandonment, is whether the present or future public convenience and necessity ("PC&N") require or permit the proposed abandonment or discontinuance. In implementing this standard, the Board balances the competing benefits and burdens of abandonment or discontinuance on all interested parties, including the railroad, the shippers on the line, the communities involved, and interstate commerce generally. *Waterloo Railway Company – Adverse Abandonment – Lines of Bangor and Aroostook Railroad, etc.* STB Docket Nos. AB-124 (Sub-No. 2) and AB-279 (Sub-No. 3) (STB served May 3, 2004) (citing *City of Cherokee v. ICC*, 727 F.2d 748 (8th Cir. 1984)). The party seeking adverse abandonment has the burden of establishing that abandonment or discontinuance is required or permitted by the PC&N. *Waterloo, id.* The function of the Board's regulatory authority with respect to abandonments is to provide the public with a degree of protection against the unnecessary discontinuance, cessation, interruption, or obstruction of available rail service. *Id.* (citing *Modern Handcraft, Inc. – Abandonment*, 363 I.C.C. 969 (1981))

In such a proceeding, the Board is required to balance the interests of the rail carrier, existing or potential shippers, the public and the party seeking the adverse abandonment. The Board's precedent has been to reject adverse abandonment applications where the railroad opposed the abandonment, there is a potential for continued rail service, and the railroad is taking steps to attract new customers. *New York Cross Harbor Railroad v. Surface Transportation Board ("Cross Harbor")*, 374 F.3d 1177 (D.C. Cir. 2004) (citing, e.g., *Salt Lake City Corp. – Adverse Abandonment – In Salt Lake City, UT*, 2002 STB LEXIS 150 (March 6, 2002); *Conrail v. ICC*, 29 F.3d 706 (D.C. Cir. 1994))

Adverse abandonments have been granted when the applicant has "established a consistent pattern of [the carrier] failing to meet its obligations to its shippers, its employees and

its lessor" (see e.g. *Fore River RR Corp – Discontinuance of Service – Norfolk County, MA*, 8 I.C.C.2d 307, 311 (Mar. 10, 1992)) or where the line had not been used for many years and the applicant had a suitable and viable immediate alternative need such as for a urban transit system. *Modern Handcraft, supra*. Adverse abandonments also have been granted where the continued operation impedes interstate commerce (*CSX Corporation et al – Adverse Abandonment – Canadian Railway Company and Grand Trunk Western Railroad Co* STB Docket No. AB-31 (Sub-No. 38) (forcing GTW to abandon trackage rights over a track in the Chicago area where CSX had a pressing and immediate need, GTW was not using it, and GTW would be given access when needed) But the instant case does not fit any of these patterns. RTRR is just now developing its rail line with a clear potential for future business

RTRR's situation is more analogous to *Cross Harbor*. There, the Board had granted a city development corporation's application to force discontinuance of Cross Harbor's floatbridge operation – carrying rail cars by barge to connecting railroads. The City owned the property and leased it to Cross Harbor for its rail operations. The City complained of lease violations as the basis for its application. It also acknowledged that it had tentative plans to use the property to develop the waterfront. Cross Harbor's business had fallen off considerably after losing its main shippers, but Cross Harbor was attempting to attract new shippers. Nonetheless, the Board held that "the City has concluded that this property should be put to other public uses, and we will not block the City from using its property as it wishes absent an overriding need for the rail service." *Id.* at 1185 (citing the Board's May 15 Decision)

On appeal, the court found the Board's decision arbitrary because it failed to properly balance the competing interests. The court cited Board and ICC precedents rejecting such applications, and noted that the Board had improperly shifted the burden of proof to the railroad and shippers to show overriding rail need. *Id.* at 1182-1183. The court also held that the Board

failed to mention "its statutory duty to preserve and promote continued rail service." *Cross Harbor at 1187* (quoting, *Western Stock Show Ass'n - Abandonment Exemption In Denver, Co*, 1 S.T.B. 13 (served June 12, 1996)).

In the instant case, Riverview is attempting to force discontinuance of RTRR's potential rail service. But Riverview cannot meet the burden of showing that such discontinuance is required or permitted by the PC&N. Riverview does not own the property and has no right to use or take it, it has no viable alternative uses for the property; and has not shown that there are any public interests that outweigh RTRR's interests in the completion of its plans for an intermodal facility. Moreover, Riverview did not and cannot show that there is no future potential for RTRR's rail services or its related rail facility. Therefore, the Board should deny the Petition to Revoke because revocation would impermissibly force the adverse discontinuance of RTRR's planned operations and abandonment of the rail line over which it is authorized to operate, contrary to the PC&N.

III. RTRR'S DESIRE TO MAINTAIN ITS COMMON CARRIER OBLIGATION AND TO PRESERVE THE RAIL RIGHT OF WAY FOR FUTURE RAIL OPERATIONS IS CONSISTENT WITH THE RTP

Although RTRR's development of rail service has been delayed, that is not grounds for revoking its exemption. RTRR's intent was and is to hold itself out to provide rail service as business develops. Under such circumstances, the retention of a rail right of way for future anticipated rail and related service is consistent with the RTP goals "to ensure the development and continuation of a sound rail transportation system with effective competition among rail carriers and with other modes, to meet the needs of the public . . ." (10101(4)), "to foster sound economic conditions in transportation and to ensure effective competition and coordination between rail carriers and other modes;" (10101(5)); and "to reduce regulatory barriers to entry into . . . the industry ." (10101(7)).

Keeping the right of way intact and available is also consistent with the Interstate Commerce Act. The statutory provisions governing the abandonment of rail lines specifically promote efforts to preserve rail lines and rights of way through processes such as line sales, offers of financial assistance, and the rails to trails program. *See* 49 U.S.C. §§ 10904 and 10905. In enacting these programs, Congress recognized that while the abandonment of a rail line may be warranted where the line is not profitable to the incumbent, the effort and cost involved in reassembling a right of way for rail use purposes at some time in the future could be daunting. Thus, it promoted means by which the right of way could be preserved for future rail service if and when needed.

Despite the current economic situation, RTRR still plans to hold itself out to provide rail service in the future. This is fully consistent with RTRR's original intent, which the Board held met the criteria for exemption. Moreover, it is also fully consistent with the goals of the RTP and the provisions of the ICA.

CONCLUSION

Riverview has not met its burden to prove that revocation of RTRR's exemption is necessary to carry out the goals of the RTP or that the RTRR abused the Board's procedures. Nor has it provided any evidence to support its unfounded contentions that RTRR has no intention of providing rail service. Despite impediments beyond its control, including poor economic conditions in the area, RTRR's progress to date is consistent with its representations in

its Petition for Exemption and with its intent to provide rail services upon demand. Riverview's Petition to Revoke accordingly should be denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David H. Coburn", with a long horizontal flourish extending to the right.

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May 9, 2007

**BEFORE THE
SURFACE TRANSPORTATION BOARD**

Finance Docket No. 34040

**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**

VERIFIED STATEMENT OF THOMAS CHRIST

My name is Thomas Christ and I am Vice President of Corporate Development for CenTra, a company that owns the parent company of Riverview Trenton Railroad Company (RTRR). I am also the Community Liaison for RTRR. My responsibilities with respect to the operation of RTRR include ensuring that communities are aware of the progress of RTRR and furthering the development of the rail operations of RTRR. I have been involved in the discussions with various contractors and others with respect to rehabilitation of the RTRR line and plans to operate that line. The purposes of this statement are (1) to describe the reasonable and prudent approach that RTRR has taken to date to implement the authorization granted by the STB to RTRR in the above captioned proceeding for the acquisition of a rail line and operation of an intermodal facility in Detroit, Michigan, (2) to describe more fully the impediments beyond RTRR's control that have delayed the commencement of rail operations, and (3) to assure the Board that RTRR is eager to go forward with the development of rail service when it is economically prudent to do so.

In February 2000, RTRR's parent, Crown Enterprises, purchased a 76-acre parcel of land that previously belonged to the McLouth Steel Company (MSC) for the purpose of developing an intermodal facility to serve both the Detroit Steel Center, Ltd (DSC), which had purchased a 195.45-acre parcel of the MSC property, and to attract intermodal business, largely from the three major Detroit area automakers. The property was ideally situated for a rail facility as it already had a rail line to the DSC, which line had formerly been used by MSC and over which DSC had given Crown an easement to allow it to operate over the rail line and to serve its plant.¹ The property had access through both the southern and northern connections with three Class I rail carriers, as well as access to major highways and to barge traffic on the Detroit River. RTRR proposed to interchange traffic with other railroads using the existing separated grade crossing at the south end of its property and also through a northern connection. At that time, there had been much talk about developing a new intermodal facility in Detroit, but no definite plans had been developed. Therefore Crown sought to take the initiative and develop its own plans for an intermodal facility on the ideally situated property. Crown shared those plans with the local communities and with the surrounding industries.

In order to carry out those plans, Crown created a railroad company, the RTRR to provide rail service. RTRR filed a Petition for Exemption on May 1, 2001. The Petition was opposed by Wayne County (which had previously taken initial steps to take the RTRR property), the City of Trenton and the City of Riverview. RTRR's planned rail line overlaps both Cities. The Cities and Wayne County based their opposition to RTRR's Petition on their preference that the property at issue be used for some undefined, non rail transportation purpose.

¹ DSC is not currently operating. RTRR understands that it is endeavoring to sell its steel manufacturing facilities in the area. Any successor to DSC that may operate a steel facility on the property adjacent to the RTRR property could be served by RTRR.

By decision served May 15, 2003, the Board granted RTRR's Petition, finding that RTRR's plan was consistent with the Rail Transportation Policy and that the other criteria for exemption were met. Even then, the local government opposition continued. The local governments sought review of the Board's May 15 decision in the U.S. Court of Appeals for the Sixth Circuit. The Sixth Circuit affirmed the Board's decision on February 10, 2005.

As RTRR indicated in its status reports to the Board, because of the uncertainty of the outcome of the judicial review, RTRR could not go forward with any substantial investment in the project until it was clear that it was authorized to conduct rail operations. Nonetheless, during this time, consistent with prudent management decisions, RTRR went forward with preliminary discussions and assessments, but made no positive commitments or investments pending resolution of the proceedings. These preliminary steps, as discussed in RTRR's reports, included discussions with auto companies and other area shippers to develop business, discussions with rail engineering firms concerning the rehabilitation of the line and the design of the intermodal facility, and discussions with firms that provide motive equipment and services, including two potential contract operators. *See First Status Report* (November 17, 2003).

In early 2004, RTRR also engaged Transdevelopment Corp. to conduct an assessment of the track condition and rehabilitation costs. RTRR entered into discussions concerning reopening the physical connection on the south end of RTRR's property and engaged Logistics Insight Corp., a logistics firm also owned by CenTra, to continue discussions with prospective rail users. *See Second Status Report* (May 17, 2004). In late 2004, RTRR contracted with a company to clean the debris off the tracks in anticipation of the court affirming the Board's May 15, 2003 decision. RTRR also entered into discussions with short line railroads concerning operation of the RTRR. *Third Status Report* (November 15, 2004).

The Sixth Circuit affirmed the Board's May 15, 2003 decision on February 10, 2005 – nearly two years after the Board granted RTRR's Petition for Exemption to operate the lines and more than four years after RTRR filed its initial notice of exemption. In light of the Court's decision, RTRR moved forward to progress the remediation of the property. It completed the cleaning of slag, coal, and ballast from the tracks in order to permit assessment of the condition of the rails, ties and fastenings. RTRR engaged a rail management expert to work out interchange and commercial relationships with the Class I railroads and to refine RTRR's business plan to reflect the changing conditions since the original business plan was developed.

Fourth Status Report (May 16, 2005).

On June 29, 2005, RTRR conducted an inspection of the easement property to identify track deficiencies there. DSC had by this time initiated the demolition of old steel mill buildings in the area of the easement track. The demolition involved use of the easement and the easement tracks by heavy trucks, which caused considerable damage to the tracks, rendering them unserviceable. Rehabilitation of the easement track could not be undertaken until the demolition was complete. RTRR's assessments of its own property showed that there was a persistent presence of water on certain portions of the north end of the property with a high pH level that was caustic enough to cause serious deterioration of the ties. Rehabilitation of the RTRR track would require the restoration to operating condition of the northern end connection with Grand Trunk Western Railway and the at-grade crossing at Jefferson Avenue in order to mobilize equipment and materials needed for the track work. RTRR hired TMH Environmental LLC to develop a plan for addressing those problems. It also hired a railroad engineering and remediation firm to perform the work and Alfonsi Railroad Construction Co. to remove the existing tracks in preparation for the remediation work. During this same period, RTRR entered

into a maintenance agreement with Canadian National ("CN") concerning the south end connection. *See Fifth Status Report* (November 15, 2005).

In early 2006, RTRR obtained Michigan Department of Transportation ("MDOT") authority to reopen the crossing at Jefferson Avenue and received the MDOT report on the type of crossing protection that would be required. Remediation on the north end also commenced at this time. However, the DSC demolition project was not completed until recently, so little could be done with respect to the easement track. *See Sixth Status Report* (May 16, 2006).

RTRR also continued to assess its business opportunities, which had changed as a result of a significant decline in the economic condition of the Detroit area that had taken place over this period of time. As discussed below, the three big auto companies -- General Motors, Chrysler and Ford -- began to have significant decreases in production, resulting in the closing of plants and laying off thousands of employees. A public policy group recently noted that the motor vehicles manufacturing sector of the economy was responsible for a large portion of the job losses in Michigan, with a loss of 36,100 or a 43.65 percent decrease in that sector's employees between December 2002 and August 2006. *See A Look at Michigan's Emerging New Economy*, by Douglas C. Drake, Public Policy Associates, Incorporated, (October 11, 2006) at Table 5, attached as Exhibit TC-1. The second largest sector change was in motor vehicle parts manufacturing which lost 56,000 jobs for a decrease of 29.23%.

Since the Board's Decision, RTRR has taken reasonable and prudent steps toward the rehabilitation of the track and made the necessary preparations for rail service, consistent with its authority, the lengthy litigation, and other impediments. The situation today is that DSC has now completed the demolition in the area of the easement and the track on the easement property over which RTRR proposes to operate trains now has been rehabilitated for rail use. (Various side tracks on the DSC property which were not part of the line over which RTRR will operate have

been removed by DSC) While additional rehabilitation of the ties on the track on the easement property will be needed in the future, the track currently is in suitable condition for the transportation of equipment and materials In addition, RTRR has already made arrangements for the maintenance of the track at the south end connection through an agreement with CN Further, RTRR has obtained the necessary authorization from MDOT to put in the crossing and warning devices needed on the north end (Jefferson Street) connection RTRR has taken the necessary steps to identify the source of the water leakage and caustic contamination, to develop a plan for addressing the problem, and to determine the extent and cost of remediation These steps position RTRR to act quickly when it determines that economic conditions warrant

The delays in implementing RTRR's plans to provide rail service have for the most part been due to circumstances beyond RTRR's control. Litigation over RTRR's authority to go forward with the project was pending for more than four years -- from RTRR's initial notice to the Board in December 2000 to the final appellate court affirmation of the RTRR's authorization to proceed in February 2005. Investment of substantial expenditure of money on the project prior to the completion of all litigation would have been imprudent

By the time the litigation was finally over, DSC had begun the months' long demolition of the old steel mill buildings rendering the easement tracks unusable As noted above, rehabilitation of the easement track and work on the south end could not be done until DSC no longer needed to use the easement for the demolition project

More recently, the Wayne County Department of Public Services ("WCDPS") has advised that it will not allow RTRR to move forward with work on the north end RTRR rail crossing of Jefferson pending completion of a county project to repair one of the two vehicular bridges linking the island of Grosse Ile to the mainland. That project would require the diversion of all vehicular traffic that might otherwise use another bridge to the sole remaining bridge in

service, which is located just 200 yards from the RTRR property and very close to the at-grade crossing of Jefferson Ave by the RTRR line. The County's action was triggered by its concern that work to restore the northern RTRR crossing to serviceable condition might disrupt an already difficult vehicular traffic situation near the only Grosse Ile bridge open for traffic. RTRR asked the WCDPS to put the request in writing, which it did on April 9, 2007. The letter states that "WCDPS will not permit rail construction activity until our project detour [referring to the detour of traffic using the remaining Grosse Ile bridge] is no longer needed." Letter from Cindy Nocerini Dingell, Deputy Chief Operating Officer, Wayne County Department of Public Services to Thomas Christ, Community Liaison, Riverview Trenton Railroad Co., dated April 9, 2007, attached as Exhibit TC-2. RTRR has taken the letter under advisement, but has not decided on the course of action it will take at this time.

Another significant impediment to the development of RTRR's planned rail operations is the dramatic change in the economic conditions of the Detroit area. When RTRR filed its petition for exemption, it had high expectations of capturing some of the auto industry's business. In the year 2000, when RTRR envisioned the intermodal facility and petitioned for authorization from the Board to become a rail carrier, Michigan was producing 1.8 million cars and 1.3 million light trucks for a total motor vehicle production of 3.1 million units. In 2006, Michigan produced only 2.3 million – a reduction of 26.7%. The change is even more dramatic for the production of cars, where Michigan suffered a 36% decrease in production from 1.8 million to 1.2 million units between 2000 and 2005. The total decrease was offset by a 5% increase in truck production for the period, but Michigan still suffered an overall decrease of 19.1% for total vehicle production. Ward's Motor Vehicle Facts & Figures 2001, 2002, 2003, 2004, 2005, 2006, attached as Exhibit TC-3.

The big three automobile companies had similar experiences, according to the same Ward's report. Between 2000 and 2005, Ford Motor Company's car production decreased by 64.2%. Although its light truck production went up 14.3%, its total vehicle production (passenger cars and light trucks) was down by 25.1% from 2000 levels. General Motors had a decline of 44.7% in cars, offset to some extent by a 13.9% increase in truck production, but its total production over that period was down 27.1%. Chrysler suffered decreases in both car (20.6%) and truck (1.5%) production, with a total vehicle production decrease of 7.7%. Michigan's total car and truck production was down 19.1% for that same time period, but also experienced a further 9.4% decrease between 2005 and 2006. Michigan's total change in car and truck production from 2000 to 2006 is a 26.7% decrease (3,109,377 units in 2000 to 2,279,672 units in 2006).² Detroit has been hit especially hard, as the total change in production for the US between 2000 and 2005 was only a 6.5% decrease. In light of the troubles that have been plaguing the auto industry in Detroit, RTRR has had to reconsider the timing (but not the goal) of its initiation of service to reflect these changing economic conditions.

RTRR is confident that Detroit will make an economic comeback and that the demand for its transportation services likewise will rebound. RTRR not only anticipates that it will benefit from the future economic revival, but fully intends to be an active participant in bringing it about, given its strategically advantageous position. Its 76-acre property is ideally situated to provide a rail facility that physically connects to three Class I railroads and has ready access to truck and barge lines as well.

Despite temporary setbacks, RTRR has not abandoned its plans to operate a rail line and related facility. RTRR will proceed with prudence and caution, making investment decisions commensurate with its assessment of the market. It is vital, however, that RTRR have its rail

² Ward's Automotive News 2007 Market Data (April 2, 2007), attached as Exhibit TC-4.

line and its operating exemption intact in order to respond promptly to changing market conditions so that it can effectuate its business plans.

I note that the City of Riverview's Petition to Revoke does not offer any alternative proposed use of the line at issue or the property occupied by RTRR. The City also has not proposed to take the line or that property. Nor has it demonstrated that it could satisfy the conditions for such a taking. It is therefore not clear what the City is trying to accomplish through its Petition to Revoke, other than to prevent RTRR from carrying out its rail transportation plans, perhaps in the vague hope that the property might be put to some other, non-transportation use.

Riverview claims at page 9 of its Petition to Revoke that "there is a good deal of heavy truck traffic at the facility." That is not correct. There is currently no truck-related activity at the site. The site is also not being used for container storage at this time.

Riverview has complained at page 10 of its Petition to Revoke that the RTRR property is not as well maintained as the City might otherwise hope and attaches selective photos to show the current state of the property. That is no basis on which to revoke an exemption from an entity that has a viable rail service plan. The property is in a condition comparable to that of other properties in the area, including other rail properties. Clearly, it would be pointless for RTRR to expend huge sums of money to beautify the property at this time, before additional rail infrastructure is completed. RTRR has committed and continues to commit that it will comply with the Board's environmental conditions.

Further, RTRR believes that it has been maintaining the property consistent with all applicable health and safety requirements, including the City of Riverview's property maintenance regulations. Riverview, MI, Code of Ordinances, Ordinance 593, Supp. No. 3, sections 74-131 and 74-133 (enacted June 20, 2006), attached as Exhibit TC-5. RTRR has never

claimed that it is not subject to reasonable and non-discriminatory health and safety requirements. Nor does Riverview claim in its Petition to Revoke that RTRR is in violation of any specific local health or safety ordinance.

Riverview has long complained that RTRR is not fulfilling environmental conditions imposed by the Board in its May 15 decision on RTRR's planned rail operations. It repeats this complaint in its Petition to Revoke. As RTRR has consistently pointed out, those environmental conditions were designed in virtually all cases to mitigate the impacts of rail traffic on the community. Since there is to date no RTRR rail traffic, most of the conditions are simply not yet operative and any non-compliance with these conditions plainly cannot provide a basis for revocation. Specifically, see environmental Condition No. 1 (notification of emergency responders in advance of using the north end grade crossing); No. 3 (consultation with various agencies and implementation of best practices prior to initiation of construction); No. 4 (compliance during development of the site with certain local laws concerning environmental matters to the extent that they do not interfere with RTRR's ability to go forward with its rail project), No. 5 (use of berms and landscaping to minimize noise from rail/intermodal operations) and No. 6 (restrictions on hours of operation of the railroad and intermodal yard). As RTRR has said in its status reports, it will comply with these conditions at such point as its obligations are triggered. Further, RTRR fully complied with the other conditions imposed by the Board, including the filing of its status reports and the appointment of a community liaison.

RTRR has had some discussions with the City of Riverview since the filing of its Petition, and is prepared to have further discussions to allay any legitimate concerns that the City might identify. RTRR is not, however, prepared to forego its rail transportation plans to satisfy the City's interest in preventing RTRR from effectuating those plans.

VERIFICATION

I, Thomas Christ, verify under penalty of perjury that I have read the foregoing verified statement, that I know the contents thereof and that the same are true and correct; and that I am qualified and authorized to file this statement.

Thomas Christ

Executed on May __, 2007

VERIFICATION

I, Thomas Christ, verify under penalty of perjury that I have read the foregoing verified statement, that I know the contents thereof and that the same are true and correct; and that I am qualified and authorized to file this statement.


Thomas Christ

Executed on May 7, 2007



A Look at Michigan's Emerging New Economy

Public Policy Research,
Development,
and Evaluation

Provided in the Public Interest by:

Public Policy Associates, Incorporated

Written by: Douglas C. Drake, Senior Policy Consultant

October 11, 2006

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Executive Summary

This report examines recent and longer-term changes, identifies major factors in recent changes, and discusses significant growth in what we call the emerging new economy

These emerging new economy jobs generally require higher education and skills, and many provide higher pay as well. We find that over the period from December 2002 to August 2006, the top 25 growing sectors of the Michigan economy have added 122,500 jobs. Of those, 55,100 are in sectors that are emblematic of the new economy. Still others would be considered part of the expanding service sector, but we have excluded those from our definition of the emerging new economy because of our interpretation that many of the jobs in this broader service sector require less skill and are less well paying.

The top 25 declining sectors accounted for 206,300 lost jobs. The bulk of these were very clearly in manufacturing and specifically motor vehicle manufacturing. Only 16,500 of the job reductions fit our emerging new economy definition, and arguably, even some of those may be due to the inverse multiplier effects of the auto losses.

The study also addresses what we believe to be the root cause of Michigan's economic difficulties: the continuing loss of market share by the manufacturers concentrated here. Just as good times for the domestic Big 3 have driven Michigan's past periods of economic prosperity, the current bad times for these companies account for a significant portion of the current economic weakness.

The study also reviews major employment changes over several time periods.

While the continued net job loss through August is not good news, there is a much more positive message when one looks at the components of job losses and gains. The losses appear to be concentrated among old economy sectors and industries, and the gains appear to be concentrated among new economy sectors and industries, both those which we label the emerging new economy and those in the broader service sector of the economy. This does not mean the difficulties will end soon, but it does indicate that there are some very positive things happening in Michigan that policy makers should be aware of as they consider adopting new policies and modifying existing policies.

Summary and Conclusions

Michigan's economy is clearly troubled—principally because the primary companies in its major industry are struggling. Michigan cannot thrive again until one or both of two events occur: these companies return to prominence and drive our economy as they have for much of the last century, or, until they at least reach a state of equilibrium that halts the loss of market share that has been bleeding them—and Michigan—for nearly a decade. Stabilization may not sound like an enviable goal, but it is the most achievable first goal, and it will allow growth in these emerging new economy sectors to create actual net job growth in the total state economy.

Michigan has long enjoyed a strong and vibrant economy because of the strength of the auto industry, and the industry will continue to be a key factor in our economy for a long time to come. The question confronting Michigan policy makers today is how to respect the past and to prepare for the ongoing future role of the auto industry while focusing change and investment on newer economy industries and sectors.

Despite the enormous impact of the changes affecting the automotive industry, the Michigan economy is also showing positive signs of growth in a number of sectors that many observers would consider to be part of an emerging new economy. This bodes well for Michigan's future.

While an enormous amount of public debate and policy thinking in Lansing has been focused on how to "save" the auto industry that is truly beyond the capacity of any state government. Ultimately, the auto industry needs to save itself, in the marketplace with better products.

On the other hand, steps that might nurture and support the continued emergence of the new economy are well within the scope of state policy

Some of these steps can be easily identified. For example, Michigan is already the world center of automotive research and design (R & D), and the workers involved in auto R & D are clearly much more highly skilled and educated than production workers. This should not lead to any degree of complacency, however.

To build upon this foundation, and expand on it, Michigan will need to substantially increase its public and private investment in education and infrastructure—and will need to change its collective attitude, and shift to a culture that values education and entrepreneurship much more heavily than we do today

Michigan can do this. Michigan has started this. Michigan must continue this journey to the future

[For readers interested in other studies of the changing economy and Michigan's competitive position, we suggest the following study "A New Agenda for a New Michigan," available online at www.michiganfuture.org]

Table 5: The Changing Structure of the Michigan Economy: Employment Changes, December 2002 to August 2006
(Measured By Percentage of Change in Employment)

Selected Detail-Declining Sectors				Selected Detail-Growing Sectors			
Sector	Chg 12/02 To 8/06	% Chg		Sector	Chg 12/02 To 8/06	% Chg	
1 Motor Vehicle Manufacturing-M	-36.1	-43.65%		Amusement Gambling and Recreation I	17.7	41.07%	1
2 Motor Vehicle Parts Manufacturing-M	-56.0	-29.23%		Services to Buildings and Dwelling	14.1	32.41%	2
3 Department Stores	-20.5	-28.67%					3
4 Electrical Equipment Appliance and-M	-4.2	-28.00%					4
5							5
6 Sporting Goods Hobby Book and Music	-6.5	-22.26%					6
7 Iron and Steel Mills and Ferroalloy-M	-1.4	-19.44%					7
8 General Merchandise Stores	-24.3	-18.42%		Truck Transportation	3.9	10.89%	8
9 Office Supplies Stationery and Gif	-2.8	-18.18%		Mining	0.6	8.96%	9
10							10
11							11
12 Other Fabricated Metal Product Man-M	-2.5	-17.24%					12
13 Special Food Services	-5.2	-17.05%					13
14				Home Health Care Services	1.8	7.71%	14
15 Wire Telecommunications Carriers	-2.3	-16.20%		Accommodation and Food Services	23.8	7.13%	15
16 Furniture and Related Product Manufacturing-M	-4.1	-14.14%		Building Material and Garden Equipment	3.3	7.02%	16
17 Printing and Related Support Activities-M	-2.7	-13.43%					17
18 Metalworking Machinery Manufacturing-M	-5.4	-12.39%					18
19 Rubber Product Manufacturing-M	-0.7	-12.28%		Architectural and Structural Metal-M	0.6	5.31%	19
20 Gambling Industries	-1.0	-12.05%		Machine Shops, Turned Product, and-M	1.4	5.15%	20
21 Miscellaneous Store Retailers	-3.8	-11.80%		Rail Transportation	0.2	4.26%	21
22 Other General Purpose Machinery Man-M	-2.1	-11.67%					22
23 Furniture and Home Furnishings Stores	-2.3	-11.56%					23
24 Automotive Repair and Maintenance	-3.8	-11.14%					24
25 Newspaper Periodical Book and Dire	-2.1	-11.11%					25

Cumulative Job Loss Worst 10
Cumulative Job Loss Worst 20
Cumulative Job Loss Worst 25

-160.8
-192.2
-206.3

Cumulative Job Gain Best 10
Cumulative Job Gain Best 20
Cumulative Job Gain Best 25

64.0
110.1
122.5

Changes in thousands 12/50 = 5,000 Source: Current Employment Statistics Analysis by Public Policy Associates
Shaded sectors represent our interpretation of probable emerging new economy jobs. Construction sectors are excluded from growing sector list due to possible seasonality comparison issues

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County Executive

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April 9, 2007

Mr Thomas Christ
Community Liaison
Riverview-Trenton Railroad Co.
12225 Stephens Road
Warren, MI 48089

Dear Mr Christ

Wayne County Department of Public Services (WCDPS) will soon begin a multi-million dollar project that will have significant impact on the area of Jefferson and Bridge Road in Riverview, adjacent to the property owned by the Riverview-Trenton Railroad (RTRR). Our project will replace the bridge decking and make other repairs to the County-owned Grosse Ile Bridge. This project requires complete closure of the Grosse Ile Bridge and diversion of over 20,000 vehicles per day to the northerly island connection on Bridge Road. The project is expected to begin in April 2007 and last until December 2007.

County staff is prepared to implement a traffic signal control plan at the intersection of Jefferson and Bridge Roads that will efficiently address the additional traffic demand at this intersection. Consideration, however, was not given to the possibility of train movement and construction activities generated by the Riverview-Trenton Railroad interrupting the Jefferson traffic.

The current MDOT Order Authorizing Reestablishment Of A Public Crossing dated March 1, 2006, for the RTRR's installation of the rail crossing Jefferson expires on March 1, 2008. WCDPS has not yet received a permit application from RTRR to install this rail. Due to the impact RTRR's rail construction and train movement would have on the detoured traffic, WCDPS will not permit rail construction activity until our project detour is no longer needed. By copy of this letter, WCDPS will request MDOT Rail Safety Section to modify the completion date of the Authorizing Order to September 2008 so reestablishment of this crossing can be accomplished after our construction project is complete.

Mr. Christ
Riverview Trenton Railroad, Inc.

Page 2

If you would like to discuss our request in greater detail, please feel free to contact me at
313-224-0260.

Sincerely,



Cindy Nocerini Dingell
Deputy Chief Operating Officer
Wayne County Department of Public Services

cc The Honorable Robert A. Ficano, Wayne County Executive
 The Honorable Joseph Palamara, Wayne County Commission
 The Honorable Timothy Durand, Mayor, City of Riverview
 The Honorable Kurt Kobihjak, Supervisor, Grosse Ile Township
 Greg Karmazing, Grosse Ile Bridge Company
 Mickey Blashfield, Director, CenTra Inc. Government Relations
 Kristina Hissong, MDOT Rail Safety Section
 James Jackson, Director, Wayne County Department of Public Services
 Hassan Saab, Deputy Director, Wayne County Department of Public Services
 Victoria Holland, Director, Wayne County Department of Public Services Engineering Division
 Fred Pilgrim, Wayne County Department of Public Services Traffic

WARD'S

Ward's Motor Vehicle Facts & Figures™ 2001

Publisher's Message

Ward's Communications is pleased to present the 2001 edition of *Ward's Motor Vehicle Facts & Figures™*. This compact but comprehensive reference book documents the performance and impact of the U.S. auto industry through nearly 100 pages of charts, graphs and statistical tables on topics including production, sales, employment, transportation expenditures, trade, ownership, accidents and government regulations.

Ward's Communications has served the automotive industry's information needs for decades, as publisher of the industry's weekly newsletter, *Ward's Automotive Reports®*, the monthly magazine, *Ward's Auto World®*, and other publications and database services.

Our hope is that *Ward's Motor Vehicle Facts & Figures 2001* will serve as a valuable reference tool to those who work in the auto industry and to the many groups with an avid interest in the business — including economists, government officials, investors and the academic community, as well as those with only an occasional or one-time research need who come across this volume at the public library.

If upon reviewing the 2001 edition of *Ward's Motor Vehicle Facts & Figures* you have comments, suggestions or questions about its contents, please contact us. We strive to make each edition better than the last.

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Passenger Car Production by City and State

PASSENGER CAR PRODUCTION BY CITY AND STATE, 2000

State/City	Model	Units	Percent	State/City	Model	Units	Percent
CALIFORNIA		197,737	3.6	WISCONSIN	Continental	22,589	0.4
Fremont	Corolla	147,741	2.7		Lincoln LS	58,791	1.1
	Prizm	49,996	0.9		Town Car	81,391	1.5
	Total NUMMI	197,737	3.6		Total Ford	668,922	12.1
DELAWARE		85,953	1.6	Craft Center	Eldorado	2,043	0.2
Wilmington	Saturn LS	85,953	1.6	Hartmanck	Fleetwood Deville	118,967	2.1
	Total General Motors	85,953	1.6		LeSabre	92,544	1.7
GEORGIA		281,801	5.1		Seville	28,026	0.5
Atlanta	Sable	58,556	1.1	Lansing	Alero	135,012	2.4
	Taurus	223,245	4.0		Cavalier	5	0.0
	Total Ford	281,801	5.1		Grand Am	250,462	4.5
ILLINOIS		724,510	13.1		Maribu	5,820	0.1
Belvidere	Dodge Neon	179,039	3.2	Onon	Sunfire	5	0.0
	Plymouth Neon	49,823	0.9		Aurora	39,921	0.7
	Total Chrysler	228,862	4.1		Bonneville	66,783	1.2
					LeSabre	71,375	1.3
Chicago	Sable	55,577	1.0		Park Ave	45,418	0.8
	Taurus	218,235	3.9		Total General Motors	866,371	15.6
	Total Ford	273,812	4.9	MISSOURI		22,798	0.4
Normal	Chrysler Sebring	19,952	0.4	Kansas City	Contour	17,410	0.3
	Dodge Avenger	1,360	0.0		Mystique	5,388	0.1
	Dodge Stratus Coupe	17,596	0.3		Total Ford	22,798	0.4
	Mitsubishi Eclipse	78,986	1.4	OHIO		1,022,393	18.4
	Mitsubishi Galant	104,143	1.9	Lordstown	Cavalier	252,023	4.5
	Total Mitsubishi	222,036	4.0		Sunfire	92,169	1.7
INDIANA		107,955	1.9		Toyota Cavalier	1,111	0.0
Lafayette	Legacy	107,955	1.9		Total General Motors	346,303	6.2
	Total Subaru	107,955	1.9	East Liberty	Civic	225,723	4.1
KANSAS		226,813	4.1	Marysville	Accord	336,034	6.1
Farfax	Grand Prix	166,929	3.0		Acura CL	31,440	0.6
	Intrigue	59,884	1.1		Acura TL	83,893	1.5
	Total General Motors	226,813	4.1		Total Honda	677,090	12.2
KENTUCKY		406,796	7.3	OKLAHOMA		254,726	4.6
Bowling Green	Corvette	34,919	0.6	Oklahoma City	Malibu	254,726	4.6
	Total General Motors	34,919	0.6		Total General Motors	254,726	4.6
Georgetown	Avalon	120,252	2.2	SOUTH CAROLINA		38,665	0.7
	Camry	251,625	4.5	Spartanburg	BMW Z3	38,665	0.7
	Total Toyota	371,877	6.7		Total BMW	38,665	0.7
MICHIGAN		1,846,995	33.3	TENNESSEE		325,075	5.9
Flat Rock	Cougar	40,178	0.7	Spring Hill	Saturn	174,946	3.2
	Mazda 626	67,255	1.2		Total General Motors	174,946	3.2
	Total AutoAlliance	107,431	1.9	Smyrna	Altima	150,129	2.7
					Total Nissan	150,129	2.7
Detroit	Prowler	2,890	0.1	TOTAL		5,542,217	100.0
	Viper	1,731	0.0				
Sterling Heights	Breeze	2,030	0.0				
	Cirrus	39,232	0.7				
	Sebring Convertible	7,338	0.1				
	Sebring Sedan	33,778	0.6				
	Stratus	117,272	2.1				
	Total Chrysler	204,271	3.7				
Dearborn	Mustang	180,431	3.3				
Wayne	Focus	325,720	5.9				

SOURCE: Ward's AutoInfoBank

Top States in Calendar 2000 U.S. Production

Rank	Cars	Rank	Trucks
1	Michigan 1,846,995	1	Michigan 1,262,382
2	Ohio 1,022,393	2	Missouri 1,112,230
3	Illinois 724,510	3	Ohio 841,636
4	Kentucky 406,796	4	Kentucky 840,940
5	Tennessee 325,075	5	Indiana 483,372

Truck Production by City and State

TRUCK PRODUCTION BY CITY AND STATE, 2000

State/City	Model	Units	Percent	State/City	Model	Units	Percent
ALABAMA							
Vance	Mercedes M Class	80,008	1.1		Town & Country	51,080	0.7
	Total Mercedes	80,009	1.1		Voyager	35,597	0.5
		80,009	1.1		Total Chrysler ...	346,152	4.8
CALIFORNIA							
Fremont	Tacoma	146,338	2.0	Kansas City 1	Escape	65,988	0.9
	Total NUMMI	146,339	2.0		Tribute	36,818	0.5
		146,339	2.0	Kansas City 2	Ford F Series	250,588	3.5
DELAWARE				St. Louis	Explorer	239,353	3.3
Newark	Durango	180,346	2.5		Total Ford	582,625	8.2
	Total Chrysler ...	180,346	2.5	Wentzville	Express	129,114	1.8
					Savana	44,339	0.6
GEORGIA					Total General Motors	173,453	2.4
Doraville	Montana	263,342	3.6	NEW JERSEY			
	Silhouette	92,701	1.3	Edison	Ford Ranger	364,840	5.0
	Venture	39,067	0.5		Mazda Pickup	142,846	2.0
	Total General Motors	131,574	1.8		Total Ford	29,552	0.4
		263,342	3.6			172,368	2.4
INDIANA							
Fort Wayne	Chevy Silverado	483,372	6.7	Under	Chevy Blazer	73,582	1.0
	GMC Sierra	190,990	2.6		Chevy S-10	85,004	1.2
	Total General Motors	61,937	0.9		GMC Jimmy	18,481	0.3
		262,927	3.5		GMC Sonoma	15,365	0.2
					Total General Motors	192,442	2.7
Lafayette	Honda Passport	21,197	0.3	OHIO			
	Isuzu Amigo	8,693	0.1	Toledo	Cherokee	841,636	11.6
	Isuzu Rodeo	72,831	1.0		Wrangler	165,580	2.3
	Total Subaru-Isuzu ..	100,721	1.4		Total Chrysler	95,440	1.3
						261,030	3.6
Princeton	Sequoia	15,000	0.2	Avon Lake	Mercury Villager	27,248	0.4
	Tundra	14,724	1.8		Nissan Quest	41,384	0.6
	Total Toyota	129,724	1.8	Lorain Truck	Econoline	216,467	3.0
					Total Ford	286,098	3.9
KENTUCKY				Moraine	Bravada	30,750	0.4
Kentucky Truck	Excursion	840,940	11.6		Chevy Blazer	79,809	2.6
	Ford F Series	58,982	0.8		GMC Jimmy	84,948	1.2
Louisville	Explorer	367,507	5.1		Total General Motors	296,507	4.1
	Mountaineer	249,640	3.5	SOUTH CAROLINA			
	Total Ford	41,248	0.6	Spartanburg	BMW X5	45,007	0.6
		717,387	9.9		Total BMW ...	45,007	0.6
Georgetown	Sienna	123,553	1.7	TENNESSEE			
	Total Toyota	123,553	1.7	Smyrna	Nissan Frontier	227,148	3.1
LOUISIANA					Nissan Xterra	119,182	1.6
Shreveport	Chevy S-10	205,152	2.8		Total Nissan	107,984	1.5
	GMC Sonoma	158,739	2.2			227,148	3.1
	Total General Motors	48,413	0.6	TEXAS			
		205,152	2.8	Arlington	Chevy C/K	102,677	1.4
MARYLAND					Escalade	20,410	0.3
Baltimore	Astro	122,334	1.7		GMC Sierra	20,042	0.3
	Safari	90,050	1.2		Tahoe	7,079	0.1
	Total General Motors	32,284	0.4		Yukon	47,410	0.7
		122,334	1.7		Total General Motors	7,736	0.1
MICHIGAN						102,677	1.4
Detroit	Grand Cherokee	1,262,382	17.5	VIRGINIA			
Warren	Dakota	293,160	4.1	Norfolk	Ford F Series	230,628	3.2
	Dodge Ram	195,072	2.7		Total Ford	230,628	3.2
	Total Chrysler	74,941	1.0	WISCONSIN			
		563,173	7.8	Janesville	Chevy CT Series	237,454	3.3
					Chevy Suburban	6,531	0.1
Detroit	Ford Chassis	23,730	0.3		Chevy Tahoe	7,594	0.1
Wayne	Expedition	241,460	3.3		Chevy W4 Tiltmaster	30,695	1.8
	Navigator	45,009	0.6		GMC CT Series	2,574	0.0
	Total Ford	310,199	4.3		GMC W4 Forward	18,495	0.3
Flint	Chevy C/K	45,227	0.6		GMC Yukon	637	0.0
	Chevy Silverado	17,364	0.2		GMC Yukon XL	60,209	0.8
	GMC Sierra	21,091	0.3		Isuzu Medium Duty	8,354	0.1
Pontiac East	Chevy Silverado	237,520	3.3		Isuzu NPR	1,574	0.0
	GMC Sierra	67,808	0.9		Total General Motors	2,791	0.0
	Total General Motors	389,010	5.4			237,454	3.3
MINNESOTA							
Two Cities	Ford Ranger	203,353	2.8	Other			
	Total Ford	203,353	2.8			279,310	3.9
MISSOURI				TOTAL			
St. Louis North	Dodge Ram	1,112,230	15.4			7,228,497	100.0
St. Louis South	Caravan	135,588	1.9				
		123,787	1.7				

SOURCE: Ward's AutoInfoBank



Ward's Motor Vehicle Facts & Figures™ 2002

Publisher's Message

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Passenger Car Production by City and State

PASSENGER CAR PRODUCTION BY CITY AND STATE, 2001

State/City	Model	Units	Percent	State/City	Model	Units	Percent
CALIFORNIA		188,967	3.9	Wiscom	Continental	17,923	0.4
Fremont	Corolla	142,947	2.9		Lincoln LS	39,081	0.8
	Prizm	46,020	0.9		Thunderbird	7,955	0.2
	Total NUMMI	188,967	3.9		Town Car	87,579	1.4
					Total Ford	544,601	11.2
DELAWARE		103,516	2.1	Hamtramck	Fleetwood Devil's	98,420	2.0
Wilmington	Saturn LS	103,516	2.1		LeSabre	80,825	1.7
	Total General Motors	103,516	2.1		Seville	25,421	0.5
GEORGIA		215,100	4.4	Lansing	Alero	119,752	2.5
Atlanta	Sable	47,213	1.0		Cavalier		0.0
	Taurus	167,887	3.4		Grand Am	197,123	4.0
	Total Ford	215,100	4.4		Malibu	109,790	2.3
					Sunfire		0.0
ILLINOIS		605,278	12.4	Craft Center	Eldorado	8,171	0.2
Belvidere	Dodge Neon	145,718	3.0	Grand River	CTS	1,424	0.0
	Plymouth Neon	35,958	0.7	Orion	Aurora	19,420	0.4
	Total Chrysler	181,676	3.7		Bonneville	46,795	1.0
					LeSabre	54,513	1.1
Chicago	Sable	50,477	1.0		Park Ave	29,931	0.6
	Taurus	179,690	3.7		Total General Motors	791,585	16.2
	Total Ford	230,167	4.7	OHIO		1,016,218	20.8
Normal	Chrysler Sebring	10,892	0.2	Lordstown	Cavalier	240,830	4.9
	Dodge Stratus Coupe	17,426	0.4		Sunfire	83,071	1.7
	Mitsubishi Eclipse	70,467	1.4		Toyota Cavalier		0.0
	Mitsubishi Galant	94,650	1.9		Total General Motors	323,841	6.6
	Total Mitsubishi	183,435	4.0	East Liberty	Civic	236,029	4.8
INDIANA		103,010	2.1	Marysville	Accord	363,232	7.4
Lafayette	Legacy	103,010	2.1		Acura CL	14,802	0.3
	Total Subaru	103,010	2.1		Acura TL	78,314	1.6
					Total Honda	682,377	14.2
KANSAS		169,609	3.5	OKLAHOMA		60,177	1.2
Fairfax	Grand Prix	131,105	2.7	Oklahoma City	Malibu	60,177	1.2
	Intrigue	38,504	0.8		Total General Motors	60,177	1.2
	Total General Motors	169,609	3.5	SOUTH CAROLINA		34,169	0.7
KENTUCKY		388,916	8.0	Spartanburg	BMW Z3	34,169	0.7
Bowling Green	Corvette	35,535	0.7		Total BMW	34,169	0.7
	Total General Motors	35,535	0.7	TENNESSEE		329,785	6.8
Georgetown	Avalon	81,321	1.7	Spring Hill	Saturn	171,909	3.5
	Camry	272,060	5.6		Total General Motors	171,909	3.5
	Total Toyota	353,381	7.2	Smyrna	Altima	157,876	3.2
MICHIGAN		1,664,374	34.1		Total Nissan	157,876	3.2
Flat Rock	Cougar	25,016	0.5	TOTAL		4,879,119	100.0
	Mazda 626	46,707	1.0				
	Total AutoAlliance	71,723	1.5	Top States in Calendar 2001 U.S. Production			
Detroit	Prowler	3,002	0.1	Rank	Cars	Rank	Trucks
	Viper	1,887	0.0	1. Michigan	1,664,374	1. Missouri	1,175,533
Sterling Heights	Sebring Convertible	50,597	1.0	2. Ohio	1,016,218	2. Michigan	1,023,173
	Sebring Sedan	82,108	1.7	3. Illinois	605,278	3. Kentucky	752,670
	Stratus	118,871	2.4	4. Kentucky	388,916	4. Ohio	722,669
	Total Chrysler	258,485	5.3	5. Tennessee	329,785	5. Indiana	494,378
Dearborn	Mustang	160,184	3.3				
Wayne	Focus	251,879	5.2				

SOURCE: Ward's AutoInfoBank

Truck Production by City and State

TRUCK PRODUCTION BY CITY AND STATE, 2001

State/City	Model	Units	Percent	State/City	Model	Units	Percent
ALABAMA		82,229	1.3				
Lincoln	Odyssey	2,283	0.0		Town & Country	2,032	0.0
	Total Honda	2,283	0.0		Voyager	58,663	0.9
Vance	Mercedes M Class	79,946	1.2		Total Chrysler	355,866	5.4
	Total Mercedes	79,946	1.2	Kansas City 1	Escape	195,213	3.0
					TrIBUTE	64,905	1.0
CALIFORNIA		162,736	2.5	Kansas City 2	Blackwood	482	0.0
Fremont	Tacoma	162,736	2.5		Ford F Series	230,825	3.5
	Total NUMMI	162,736	2.5	St. Louis	Explorer	165,331	2.5
					Mountaineer	25,231	0.4
DELAWARE		132,445	2.0		Total Ford	681,767	10.4
Newark	Durango	132,445	2.0	Wentzville	Express	100,568	1.5
	Total Chrysler	132,445	2.0		Savana	37,334	0.6
					Total General Motors	137,900	2.1
GEORGIA		226,857	3.5	NEW JERSEY		283,087	4.3
Doraville	Montana	75,825	1.2	Edison	Ford Ranger	108,808	1.6
	Silhouette	35,902	0.5		Mazda Pickup	28,508	0.4
	Venture	115,330	1.8		Total Ford	135,314	2.1
	Total General Motors	226,857	3.5	Linden	Chevy Blazer	113,158	1.7
INDIANA		494,378	7.6		Chevy S-10	21,011	0.3
Fort Wayne	Chevy Silverado	187,430	2.9		GMC Jimmy	7,840	0.1
	GMC Sierra	54,199	0.8		GMC Sonoma	5,964	0.1
	Total General Motors	241,629	3.7		Total General Motors	147,773	2.3
Lafayette	Honda Passport	14,765	0.2	OHIO		722,899	11.0
	Isuzu Axiom	11,722	0.2	Toledo	Cherokee	51,846	0.8
	Isuzu Rodeo	56,820	0.9		Wrangler	71,016	1.1
	Total Subaru-Isuzu	83,307	1.3	Toledo North	Liberty	146,485	2.2
Princeton	Sequoia	71,308	1.1		Total Chrysler	289,347	4.1
	Tundra	98,134	1.5	Avon Lake	Mercury Villager	16,344	0.2
	Total Toyota	169,442	2.6		Nissan Quest	29,898	0.5
KENTUCKY		752,670	11.5	Lorain Truck	Econoline	149,210	2.3
Kentucky Truck	Excursion	30,712	0.5		Total Ford	195,450	3.0
	Ford F-SuperDuty	347,591	5.3	Moraine	Bravada	25,561	0.4
Louisville	Explorer	259,081	4.0		Chevy Trailblazer	183,253	2.5
	Mountaineer	22,488	0.3		GMC Envoy	89,258	1.1
	Total Ford	659,882	10.1		GMC Jimmy		0.0
Georgetown	Sienna	92,818	1.4		Total General Motors	266,072	3.9
	Total Toyota	92,818	1.4	SOUTH CAROLINA		85,165	1.3
LOUISIANA		154,048	2.4	Spartanburg	BMW X5	85,155	1.3
Shreveport	Chevy S-10	120,633	1.8		Total BMW	85,155	1.3
	GMC Sonoma	33,415	0.5	TENNESSEE		171,633	2.6
	Total General Motors	154,048	2.4	Smyrna	Nissan Frontier	80,567	1.2
MARYLAND		82,264	1.3		Nissan Xterra	87,762	1.3
Baltimore	Astro	59,585	0.9		Total Nissan	168,349	2.6
	Safar	22,679	0.3	Spring Hill	VUE	3,284.0	0.1
	Total General Motors	82,264	1.3		Total General Motors	3,284.0	0.1
MICHIGAN		1,023,173	15.6	TEXAS		203,153	3.1
Detroit	Grand Cherokee	214,773	3.3	Arlington	Escalade	36,657	0.6
Warren	Dakota	159,688	2.4		Tahoe	125,794	1.9
	Dodge Ram	60,384	0.9		Yukon	40,702	0.6
	Total Chrysler	434,825	6.6		Total General Motors	203,153	3.1
Detroit	Ford Chassis	14,529	0.2	VIRGINIA		195,160	3.0
Wayne	Expedition	180,514	2.8	Norfolk	Ford F Series	195,160	3.0
	Navigator	29,786	0.5		Total Ford	195,160	3.0
	Total Ford	224,829	3.4	WISCONSIN		248,334	3.8
First No. 1	Chevy Silverado	115,227	1.8	Janesville	Chevy CT Series	5,308	0.1
	GMC Sierra	39,599	0.6		Chevy Suburban	83,844	1.0
First No. 3	Chevy CT Series	26	0.0		Chevy Tahoe	73,571	1.1
	GMC CT Series	73	0.0		Chevy W4 Tiltmaster	2,249	0.0
Pontiac East	Chevy Silverado	158,249	2.4		GMC CT Series	12,277	0.2
	GMC Sierra	50,345	0.8		GMC Yukon	41,756	0.6
	Total General Motors	363,519	5.6		GMC Yukon XL	44,776	0.7
					GMC W4 Forward	557	0.0
MINNESOTA		173,163	2.6		Isuzu W4 NPR	2,439	0.0
Twin Cities	Ford Ranger	173,163	2.6		Isuzu Medium Duty	1,557	0.0
	Total Ford	173,163	2.6		Total General Motors	248,334	3.8
MISSOURI		1,176,533	18.0	Other		176,683	2.7
St. Louis North	Ram Pickup	111,463	1.7	TOTAL		6,545,670	100.0
St. Louis South	Caravan	183,708	2.8				

SOURCE: Ward's AutoInfoBank

WARD'S

Ward's Motor Vehicle Facts & Figures™ 2003

Ward's Communications is pleased to present the 2003 edition of *Ward's Motor Vehicle Facts & Figures™*. This compact but comprehensive reference book documents the performance and impact of the U.S. auto industry through nearly 100 pages of charts, graphs and statistical tables on topics including production, sales, employment, transportation expenditures, trade, ownership, accidents and government regulations.

Ward's Communications has served the automotive industry's information needs for decades, as publisher of the industry's weekly newsletter, *Ward's Automotive Reports®*, the monthly magazine, *Ward's Auto World®*, and our website WardsAuto.com, along with other publications and database services.

Our hope is that *Ward's Motor Vehicle Facts & Figures 2003* will serve as a valuable reference tool to those who work in the auto industry and to the many groups with an avid interest in the business — including economists, government officials, investors and the academic community, as well as those with only an occasional or one-time research need.

If upon reviewing the 2003 edition of *Ward's Motor Vehicle Facts & Figures* you have comments, suggestions or questions about its contents, please contact us. We strive to publish the best information available.

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Passenger Car Production by City and State

PASSENGER CAR PRODUCTION BY CITY AND STATE, 2002

State/City	Model	Units	Percent	State/City	Model	Units	Percent
CALIFORNIA		205,306	4.1	Wayne	Ford Focus	273,591	5.5
Fremont	Pontiac Vibe	59,556	1.2	Wixom	Ford Thunderbird	25,722	0.5
	Toyota Corolla	137,842	2.7		Lincoln Continental	12,703	0.3
	Toyota Voltz	8,108	0.2		Lincoln LS	41,078	0.8
	Total NUMMI	205,306	4.1		Lincoln Town Car	66,181	1.3
DELAWARE		98,899	2.0		Total Ford	590,537	11.8
Wilmington	Saturn L-Series	98,899	2.0	Hamtramck	Buick LeSabre	99,457	2.0
	Total General Motors	98,899	2.0		Cadillac DeVille	86,849	1.7
GEORGIA		244,294	4.9		Cadillac Seville	23,428	0.5
Atlanta	Ford Taurus	190,301	3.8	Lansing	Chevrolet Malibu	203,493	4.1
	Mercury Sable	53,993	1.1		Oldsmobile Alero	107,390	2.1
	Total Ford	244,294	4.9		Pontiac Grand Am	193,473	3.9
ILLINOIS		608,952	12.1	Lansing (Crest Center)	Cadillac Eldorado	2,721	0.1
Belvedere	Chrysler Neon	12,054	0.2	Lansing (Grand River)	Cadillac CTS	47,072	0.9
	Dodge Neon	156,985	3.1	Onon	Buick LeSabre	43,190	0.9
	Total Chrysler Group ⁽¹⁾	169,042	3.4		Buick Park Ave	32,550	0.6
Chicago	Ford Taurus	184,918	3.7		Oldsmobile Aurora	7,217	0.1
	Mercury Sable	52,640	1.0		Pontiac Bonneville	38,397	0.8
	Total Ford	237,558	4.7		Total General Motors	885,237	17.6
Normal	Chrysler Sebring Coupe	10,103	0.2	OHIO		989,509	19.7
	Dodge Stratus Coupe	17,783	0.4	Lordstown	Chevrolet Cavalier	264,937	5.3
	Mitsubishi Eclipse	74,816	1.5		Pontiac Sunfire	83,463	1.7
	Mitsubishi Galant	99,850	2.0		Total General Motors	348,400	6.9
	Total Mitsubishi	202,352	4.0	East Liberty	Honda Civic	219,134	4.4
INDIANA		93,125	1.9	Marysville	Acura CL	13,625	0.3
Lafayette	Subaru Legacy	93,125	1.9		Acura TL	72,119	1.4
	Total Subaru	93,125	1.9		Honda Accord	336,231	6.7
KANSAS		159,056	3.2		Total Honda	641,108	12.8
Fairfax	Oldsmobile Intrigue	13,243	0.3	SOUTH CAROLINA		23,188	0.5
	Pontiac Grand Prix	145,813	2.9	Spartanburg	BMW Z3	11,634	0.2
	Total General Motors	159,056	3.2		BMW Z4	11,554	0.2
KENTUCKY		422,798	8.4		Total BMW	23,188	0.5
Bowling Green	Chevrolet Corvette	35,936	0.7	TENNESSEE		380,930	7.6
	Total General Motors	35,936	0.7	Spring Hill	Saturn Ion	35,000	0.7
Georgetown	Toyota Avalon	75,250	1.5		Saturn S-Series	110,457	2.2
	Toyota Camry	311,610	6.2		Total General Motors	145,457	2.9
	Total Toyota	386,860	7.7	Smyrna	Nissan Altima	235,445	4.7
MICHIGAN		1,792,720	35.7		Nissan Maxima	28	0.0
Flat Rock	Mazda6	14,731	0.3		Total Nissan Motor Mfg.	235,473	4.7
	Mazda 626	32,872	0.7	TOTAL CARS		5,018,777	100.0
	Mercury Cougar	18,321	0.4				
	Total AutoAlliance	65,924	1.3	TOP STATES IN CALENDAR 2002 U.S. PRODUCTION			
Detroit	Chrysler Prowler	329	0.0	Rank	Cars	Rank	Trucks
	Dodge Viper	1,021	0.0	1 Michigan	1,792,720	1 Missouri	1,274,151
Sterling Heights	Chrysler Sebring Conv	50,020	1.0	2 Ohio	989,509	2 Michigan	1,125,611
	Chrysler Sebring Sedan	84,803	1.7	3 Illinois	608,952	3 Ohio	844,179
	Dodge Stratus Sedan	114,849	2.3	4 Kentucky	422,798	4 Kentucky	791,870
	Total Chrysler Group ⁽¹⁾	251,022	5.0	5 Tennessee	380,930	5 Indiana	478,887
Dearborn	Ford Mustang	171,262	3.4				

(1) Chrysler Group is former Chrysler Corp. operations only SOURCE: Ward's AutoInfoBank

Truck Production by City and State

TRUCK PRODUCTION BY CITY AND STATE, 2002

State/City	Model	Units	Percent	State/City	Model	Units	Percent
ALABAMA		186,391	2.7				
Lincoln	Honda Odyssey	108,020	1.5	St. Louis	Lincoln Blackwood	3,125	0.0
	Total Honda	108,020	1.5		Ford Explorer	188,454	2.6
Vance	Mercedes M-Class	85,271	1.2		Lincoln Aviator	7,793	0.1
	Total Mercedes	85,271	1.2		Mercury Mountaineer	26,048	0.4
CALIFORNIA		164,550	2.3		Total Ford	738,430	10.2
Fremont	Toyota Tacoma	164,550	2.3	Wentzville	Chevrolet Express	108,168	1.5
	Total NUMMI	164,550	2.3		GMC Savana	39,972	0.6
DELAWARE		122,338	1.7		Total General Motors	148,140	2.0
Newark	Dodge Durango	122,338	1.7	NEW JERSEY		186,976	2.6
	Total Chrysler Group ⁽¹⁾	122,338	1.7	Edison	Ford Ranger	52,717	0.7
GEORGIA		238,609	3.3		Mazda Pickup	22,091	0.3
Doraville	Chevrolet Venture	130,028	1.8		Total Ford	74,808	1.0
	Oldsmobile Silhouette	23,391	0.3	Linden	Chevrolet Blazer	79,739	1.1
	Pontiac Montana	85,190	1.2		Chevrolet S10	21,873	0.3
	Total General Motors	238,609	3.3		GMC Jimmy	3,167	0.0
INDIANA		478,987	6.8		GMC Sonoma	7,589	0.1
Fort Wayne	Chevrolet Silverado	192,633	2.7		Total General Motors	112,168	1.5
	GMC Sierra	61,139	0.8	OHIO		847,787	11.7
	Total General Motors	253,872	3.5	Toledo	Jeep Wrangler	76,808	1.1
Lafayette	Honda Passport	287	0.0	Toledo North	Jeep Liberty	225,714	3.1
	Isuzu Axiom	6,989	0.1		Total Chrysler Group ⁽¹⁾	302,322	4.2
	Isuzu Rodeo	21,744	0.3	Avon Lake	Mercury Villager	13,551	0.2
	Subaru Baja	9,688	0.1		Nissan Quest	13,340	0.2
	Total Subaru	38,706	0.5	Lorain	Ford Econoline	189,530	2.6
Princeton	Toyota Sequoia	77,529	1.1		Total Ford	216,421	3.0
	Toyota Tundra	108,978	1.5	Moraine	Chevrolet TrailBlazer	214,192	2.9
	Total Toyota	186,507	2.6		Chevrolet TrailBlazer EXT	3,545	0.0
KENTUCKY		791,870	10.9		GMC Envoy	93,744	1.3
Kentucky Truck	Ford Excursion	29,361	0.4		GMC Envoy XL	1,786	0.0
	Ford F-SuperDuty	347,762	4.8		Isuzu Ascender	1,926	0.0
Louisville	Ford Explorer	297,385	4.1		Oldsmobile Bravada	10,263	0.1
	Mercury Mountaineer	23,021	0.3		Total General Motors	325,438	4.5
	Total Ford	667,829	9.6	East Liberty	Honda Element	3,606	0.0
Georgetown	Toyota Sienna	94,341	1.3		Total Honda	3,606	0.0
	Total Toyota	94,341	1.3	OKLAHOMA		120,697	1.7
LOUISIANA		176,913	2.4	Oklahoma City	Chevrolet TrailBlazer EXT	77,637	1.1
Shreveport	Chevrolet S10	135,386	1.9		GMC Envoy XL	43,060	0.6
	GMC Sonoma	37,527	0.5		Total General Motors	120,697	1.7
	Total General Motors	176,913	2.4	SOUTH CAROLINA		100,140	1.4
MARYLAND		76,596	1.1	Spartanburg	BMW X5	100,140	1.4
Baltimore	Chevrolet Astro	58,097	0.8		Total BMW	100,140	1.4
	GMC Safari	18,498	0.3	TENNESSEE		282,244	3.8
	Total General Motors	76,596	1.1	Spring Hill	Saturn Vue	87,883	1.2
MICHIGAN		1,125,911	15.5		Total General Motors	87,883	1.2
Detroit	Jeep Grand Cherokee	253,237	3.5	Smyrna	Nissan Frontier	83,986	1.2
Warren	Dodge Dakota	181,750	2.2		Nissan Xterra	90,395	1.2
	Dodge Ram Pickup	102,280	1.4		Total Nissan	174,381	2.4
	Total Chrysler Group ⁽¹⁾	517,267	7.1	TEXAS		220,450	3.0
Detroit	Ford Chassis	10,176	0.1	Arlington	Cadillac Escalade	40,337	0.6
Wayne	Ford Expedition	180,450	2.2		Chevrolet Suburban	2,916	0.0
	Lincoln Navigator	32,633	0.4		Chevrolet Tahoe	134,805	1.9
	Total Ford	203,259	2.8		GMC Yukon	40,563	0.6
Flint No. 1	Chevrolet Silverado	114,025	1.6		GMC Yukon XL	1,829	0.0
	GMC Sierra	42,938	0.6		Total General Motors	220,450	3.0
Flint No. 3	Chevrolet Kodiak	8,010	0.1	VIRGINIA		228,843	3.2
	GMC Topkick	5,909	0.1	Norfolk	Ford F-Series	228,843	3.2
Lansing (Craft Center)	Chevrolet SSR	5	0.0		Total Ford	228,843	3.2
Pontiac East	Chevrolet Silverado	178,792	2.5	WISCONSIN		257,786	3.5
	GMC Sierra	55,406	0.8	Janesville	Chevrolet CT Series	3,705	0.1
	Total General Motors	405,088	5.6		Chevrolet Suburban	61,109	0.8
MINNESOTA		181,257	2.5		Chevrolet Tahoe	86,064	1.2
Twin Cities	Ford Ranger	181,257	2.5		Chevrolet W4 Tiltmaster	1,833	0.0
	Total Ford	181,257	2.5		GMC CT Series	10,341	0.1
MISSOURI		1,274,151	17.5		GMC W4 Forward	454	0.0
St. Louis North	Dodge Ram Pickup	180,812	2.2		GMC Yukon	48,996	0.6
St. Louis South	Chrysler Voyager	44,375	0.6		GMC Yukon XL	44,404	0.6
	Dodge Caravan	184,394	2.5		Isuzu Medium-Duty	864	0.0
	Total Chrysler Group ⁽¹⁾	389,581	5.4		Isuzu W4 NPR	1,986	0.0
Kansas City 1	Ford Escape	198,244	2.7		Total General Motors	257,786	3.5
	Mazda Tribute	65,639	0.9	Other		208,840	2.9
Kansas City 2	Ford F-Series	250,929	3.5	TOTAL TRUCKS		7,380,805	100.0

(1) Chrysler Group is former Chrysler Corp. operations only. SOURCE: Ward's AutoInfoBank.

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WARD'S

or Vehicle Facts & Figures™ 2004

Used to present the 2004 edition of *Ward's Motor Vehicle Facts & Figures™*, this reference book documents the performance and impact of the U.S. auto industry with charts, graphs and statistical tables on topics including production, expenditures, trade, ownership, accidents and government regulations.

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Passenger Car Production by City and State

PASSENGER CAR PRODUCTION BY CITY AND STATE, 2003

State/City	Model	Units	Percent	State/City	Model	Units	Percent
CALIFORNIA		233,517	5.2		Dodge Stratus Sedan	97,261	2.2
Fremont	Pontiac Vibe	74,223	1.6		Total Chrysler Group⁽¹⁾	210,211	4.7
	Toyota Corolla	157,561	3.5	Dearborn	Ford Mustang	154,937	3.4
	Toyota Voltz	1,733	0.0	Wayne	Ford Focus	204,328	4.5
	Total NUMMI	233,517	5.2	Wixom	Ford Thunderbird	18,937	0.4
					Lincoln LS	39,579	0.9
DELAWARE		45,440	1.0		Lincoln Town Car	54,458	1.2
Wilmington	Saturn L-Series	45,440	1.0		Total Ford	472,139	10.5
	Total General Motors	45,440	1.0	Hamtramck	Pontiac Bonneville	6,978	0.2
GEORGIA		175,368	3.9		Buick LeSabre	71,233	1.6
Atlanta	Ford Taurus	146,894	3.3		Cadillac DeVille	82,965	1.8
	Mercury Sable	28,464	0.6	Lansing	Cadillac Seville	16,819	0.3
	Total Ford	175,368	3.9		Chevrolet Malibu	135,478	3.0
					Oldsmobile Alero	111,680	2.5
ILLINOIS		483,246	10.8		Pontiac Grand Am	174,324	3.9
Belviders	Chrysler Neon	1,859	0.0	Lansing (Grand River)	Cadillac CTS	59,250	1.3
	Dodge Neon	150,967	3.3	Orion	Buick LeSabre	60,729	1.3
	Total Chrysler Group⁽¹⁾	182,816	3.4		Buick Park Ave	26,816	0.6
Chicago	Ford Taurus	147,432	3.3		Oldsmobile Aurora	1,786	0.0
	Mercury Sable	26,751	0.6		Pontiac Bonneville	15,673	0.3
	Total Ford	174,183	3.6		Total General Motors	792,329	16.9
Normal	Chrysler Sebring Coupe	9,332	0.2	OHIO		927,925	20.6
	Dodge Stratus Coupe	18,056	0.4	Lordstown	Chevrolet Cavalier	282,424	6.3
	Mitsubishi Eclipse	39,297	0.9		Pontiac Sunfire	52,393	1.2
	Mitsubishi Galant	59,572	1.3		Total General Motors	334,817	7.4
	Total Mitsubishi	128,247	2.8	East Liberty	Honda Civic	147,564	3.3
INDIANA		89,243	2.0	Marysville	Acura CL	4,201	0.1
Lafayette	Subaru Legacy	89,243	2.0		Acura TL	60,397	1.3
	Total Subaru	89,243	2.0		Honda Accord	380,946	8.4
					Total Honda	583,108	13.1
KANSAS		67,364	1.5	SOUTH CAROLINA		56,569	1.3
Fairfax	Chevrolet Malibu	48,877	1.1	Spartanburg	BMW Z4	56,569	1.3
	Pontiac Grand Prix	18,687	0.4		Total BMW	56,569	1.3
	Total General Motors	67,364	1.5	TENNESSEE		460,076	10.2
KENTUCKY		473,610	10.5	Spring Hill	Saturn Ion	138,008	3.1
Bowling Green	Cadillac XLR	1,731	0.0		Total General Motors	138,008	3.1
	Chevrolet Corvette	36,026	0.8	Smyrna	Nissan Altima	240,666	5.3
	Total General Motors	37,757	0.8		Nissan Maxima	81,402	1.8
Georgetown	Toyota Avalon	49,250	1.1		Total Nissan Motor Mfg	322,068	7.1
	Toyota Camry	356,829	7.9	TOTAL CARS	4,810,469	100.0	
	Toyota Solara	29,774	0.7				
	Total Toyota	435,853	9.7				
MICHIGAN		1,528,101	33.9	TOP STATES IN CALENDAR 2003 U.S. PRODUCTION			
Flat Rock	Ward's	83,422	1.8	Rank	Cars	Rank	Trucks
	Total AutoAlliance	83,422	1.8	1 Michigan	1,528,101	1. Missouri	1,297,647
Detroit	Dodge Viper	2,484	0.1	2 Ohio	927,925	2 Michigan	1,255,736
Sterling Heights	Chrysler Sebring Convertible	46,158	1.0	3 Kentucky	473,610	3 Ohio	956,952
	Chrysler Sebring Sedan	64,308	1.4	4 Tennessee	460,076	4 Kentucky	691,357
				5 Illinois	453,246	5 Indiana	591,549

(1) Chrysler Group is former Chrysler Corp. operations only SOURCE Ward's AutoInfoBank

PRODUCTION

Truck Production by City and State

TRUCK PRODUCTION BY CITY AND STATE, 2003

State/City	Model	Units	Percent	State/City	Model	Units	Percent
ALABAMA		252,025	3.3	MISSOURI		1,297,847	17.1
Lincoln	Honda Odyssey	187,925	2.2	St. Louis North	Dodge Ram Pickup	180,351	2.6
Vance	Total Honda	187,925	2.2	St. Louis South	Chrysler Town & Country	14,429	0.2
	Mercedes M-Class	84,100	1.1		Chrysler Voyager	12,887	0.2
	Total Mercedes	84,100	1.1		Dodge Caravan	210,810	2.8
CALIFORNIA		181,568	2.1		Total Chrysler Group ⁽¹⁾	427,257	6.8
Fremont	Toyota Tacoma	181,568	2.1	Kansas City 1	Ford Escape	196,856	2.6
	Total NUMMI	181,568	2.1		Mazda Tribute	81,827	0.8
DELAWARE		113,787	1.5	Kansas City 2	Ford F-Series	231,712	3.1
Newark	Dodge Durango	113,787	1.5	St. Louis	Ford Explorer	159,815	2.1
	Total Chrysler Group ⁽¹⁾	113,787	1.5		Lincoln Aviator	34,412	0.5
GEORGIA		204,923	2.7		Mercury Mountaineer	24,419	0.3
Doraville	Chevrolet Venture	117,055	1.5	Wentzville	Total Ford	709,041	9.4
	Oldsmobile Silhouette	16,276	0.2		Chevrolet Express	119,154	1.6
	Pontiac Montana	71,592	0.9		GMC Savana	42,195	0.8
	Total General Motors	204,923	2.7		Total General Motors	161,349	2.1
ILLINOIS		47,452	0.6	NEW JERSEY		188,837	2.1
Normal	Mitsubishi Endeavor	47,452	0.6	Edison	Ford Ranger	38,581	0.5
	Total Mitsubishi	47,452	0.6		Mazda Pickup	23,413	0.3
INDIANA		891,849	7.8		Total Ford	62,004	0.8
Fort Wayne	Chevrolet Silverado	209,027	2.8	Linden	Chevrolet Blazer	86,207	0.9
	GMC Sierra	58,017	0.8		Chevrolet S10	22,281	0.3
	Total General Motors	267,044	3.5		GMC Jimmy	2,154	0.0
Lafayette	Isuzu Axiom	4,898	0.1		GMC Sonoma	8,211	0.1
	Isuzu Rodeo	20,241	0.3		Total General Motors	98,833	1.3
	Subaru Baja	7,750	0.1	OHIO		958,962	12.6
	Total Subaru	32,989	0.4	Toledo	Jeep Wrangler	84,486	1.1
Princeton	Toyota Sequoia	86,688	0.8	Toledo North	Jeep Liberty	237,712	3.1
	Toyota Sienna	118,188	1.8		Total Chrysler Group ⁽¹⁾	322,198	4.3
	Toyota Tundra	105,660	1.4	Avon Lake	Ford Escape	19,581	0.3
	Total Toyota	291,516	3.8	Lorain	Ford Econoline	178,308	2.4
KENTUCKY		891,387	9.1		Total Ford	197,899	2.8
Kentucky Truck	Ford Excursion	25,619	0.3	Moraine	Buick Rainier	17,031	0.2
	Ford F-SuperDuty	377,149	5.0		Chevrolet TrailBlazer	231,720	3.1
Louisville	Ford Explorer	284,200	3.5		GMC Envoy	98,714	1.3
	Mercury Mountaineer	24,389	0.3		Oldsmobile Bravada	7,120	0.1
	Total Ford	891,387	9.1		Total General Motors	362,586	4.7
LOUISIANA		122,583	1.6	East Liberty	Honda Element	84,280	1.1
Shreveport	Chevrolet Colorado	18,180	0.2		Total Honda	84,280	1.1
	Chevrolet S10	75,528	1.0	OKLAHOMA		144,256	1.9
	GMC Canyon	5,459	0.1	Oklahoma City	Chevrolet TrailBlazer EXT	78,243	1.0
	GMC Sonoma	23,418	0.3		GMC Envoy XL	60,114	0.7
	Total General Motors	122,583	1.6		GMC Envoy XUV	13,873	0.2
MARYLAND		48,831	0.6		Isuzu Ascender	4,025	0.1
Baltimore	Chevrolet Astro	38,181	0.5		Total General Motors	144,256	1.9
	GMC Safari	12,450	0.2	SOUTH CAROLINA		109,501	1.4
	Total General Motors	48,831	0.6	Spartanburg	BMW X5	109,501	1.4
MICHIGAN		1,255,739	16.6		Total BMW	109,501	1.4
Detroit	Jeep Grand Cherokee	224,823	3.0	TENNESSEE		231,397	3.1
Warren	Dodge Dakota	122,772	1.6	Spring Hill	Saturn Vue	99,349	1.3
	Dodge Ram Pickup	152,140	2.0		Total General Motors	99,349	1.3
	Total Chrysler Group ⁽¹⁾	499,735	6.6	Smyrna	Nissan Frontier	92,111	0.8
Detroit	Ford Chassis	6,980	0.1		Nissan Xterra	69,837	0.9
Wayne	Ford Expedition	201,510	2.7		Total Nissan	131,948	1.7
	Lincoln Navigator	40,505	0.5	TEXAS		238,396	3.1
	Total Ford	248,995	3.3	Arlington	Cadillac Escalade	38,800	0.5
Flint No 1	Chevrolet Silverado	121,585	1.6		Chevrolet Suburban	5,715	0.1
Flint No 3	GMC Sierra	43,758	0.6		Chevrolet Tahoe	147,010	1.9
	Chevrolet Kodiak	9,289	0.1		GMC Yukon	43,824	0.8
	GMC Topkick	11,310	0.1		GMC Yukon XL	3,047	0.0
	Isuzu Truck	307	0.0		Total General Motors	238,396	3.1
Lansing (Craft Center)	Chevrolet SSR	3,522	0.0	VIRGINIA		201,916	2.7
Lansing (Grand River)	Cadillac SRX	15,404	0.2	Norfolk	Ford F-Series	201,916	2.7
Pontiac East	Chevrolet Silverado	233,680	3.1		Total Ford	201,916	2.7
	GMC Sierra	68,133	0.9	WISCONSIN		281,568	3.5
	Total General Motors	607,008	6.7	Janesville	Chevrolet Suburban	80,230	0.8
MINNESOTA		185,842	2.5		Chevrolet Tahoe	85,833	1.1
Twin Cities	Ford Ranger	185,842	2.5		Chevrolet W4 Tiltmaster	1,620	0.0
MISSISSIPPI		68,255	0.9		GMC W4 Forward	402	0.0
Canton	Nissan Armada	18,085	0.2		GMC Yukon	61,238	0.8
	Nissan Quest	40,445	0.5		GMC Yukon XL	50,492	0.7
	Nissan Titan	9,745	0.1		Isuzu W4 NPR	1,753	0.0
	Total Nissan	68,255	0.9		Total General Motors	281,568	3.5
TOTAL TRUCKS						7,576,559	100.0

(1) Chrysler Group is former Chrysler Corp. operations only SOURCE Ward's AutoInfoBank

WARD'S

Ward's Motor Vehicle Facts & Figures™ 2005

Ward's Communications is pleased to present the 2005 edition of *Ward's Motor Vehicle Facts & Figures™*. This compact but comprehensive reference book documents the performance and impact of the U.S. auto industry through nearly 100 pages of charts, graphs and statistical tables on topics including production, sales, employment, transportation expenditures, trade, ownership, accidents and government regulations.

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If upon reviewing the 2005 edition of *Ward's Motor Vehicle Facts & Figures* you have comments, suggestions or questions about its contents, please contact us. We strive to publish the best information available.

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Passenger Car Production by City and State

PASSENGER CAR PRODUCTION BY CITY AND STATE, 2004

State/City	Model	Units	Percent	State/City	Model	Units	Percent
CALIFORNIA		237,397	5.8	Wayne	Ford Focus	184,805	4.4
Fremont	Pontiac Vibe	68,226	1.6	Wixom	Ford GT	500	—
	Toyota Corolla	167,970	4.0		Ford Thunderbird	10,716	0.3
	Toyota Voltz	201	—		Lincoln LS	27,148	0.8
	Total NUMMI	237,397	5.8		Lincoln Town Car	53,958	1.3
DELAWARE		11,729	0.3		Total Ford	346,829	8.2
Wilmington	Saturn L-Series	11,729	0.3	Hemlock	Buick LeSabre	83,228	2.0
	Total General Motors	11,729	0.3		Cadillac DeVille	83,459	1.6
GEORGIA		235,542	5.8		Cadillac Seville	5	—
Atlanta	Ford Taurus	197,842	4.7	Lansing	Pontiac Bonneville	31,693	0.7
	Mercury Sable	37,700	0.9		Chevrolet Malibu	88,107	2.1
	Total Ford	235,542	5.8		Oldsmobile Alero	18,906	0.4
ILLINOIS		346,130	8.2	Lansing (Craft Center)	Pontiac Grand Am	116,877	2.8
Belvidere	Chrysler Neon	1,844	—		Cadillac CTS	71,518	1.7
	Dodge Neon	139,004	3.3		Cadillac STS	20,496	0.5
	Total Chrysler Group	140,848	3.3	Orion	Buick LeSabre	20,083	0.5
Chicago	Ford Five Hundred	42,782	1.0		Buick Park Ave	12,801	0.3
	Ford Taurus	57,000	1.3		Pontiac G6	42,186	1.0
	Mercury Montego	7,448	0.2		Total General Motors	588,159	13.5
	Mercury Sable	6,516	0.2	MISSISSIPPI		89,892	1.4
	Total Ford	113,748	2.7	Canton	Nissan Altima	59,892	1.4
Norman	Chrysler Sebring Coupe	12,103	0.3		Total Nissan	59,892	1.4
	Dodge Stratus Coupe	23,035	0.5	OHIO		797,009	18.8
	Mitsubishi Eclipse	11,210	0.3	Lordstown	Chevrolet Cavalier	180,175	4.3
	Mitsubishi Galant	45,188	1.1		Chevrolet Cobalt	25,994	0.6
	Total Mitsubishi	91,638	2.2		Pontiac Pursuit	2,576	0.1
INDIANA		98,298	2.3		Pontiac Sunfire	21,298	0.5
Lafayette	Subaru Legacy	98,298	2.3		Total General Motors	230,042	5.4
	Total Subaru	98,298	2.3	East Liberty	Honda Civic	133,995	3.2
KANSAS		227,064	5.4	Marysville	Acura TL	82,635	2.0
Fairfax	Chevrolet Malibu	227,064	5.4		Honda Accord	350,337	8.3
	Total General Motors	227,064	5.4		Total Honda	596,967	13.4
KENTUCKY		504,477	11.9	SOUTH CAROLINA		35,136	0.8
Bowling Green	Cadillac XLR	5,314	0.1	Spartanburg	BMW Z4	35,136	0.8
	Chevrolet Corvette	28,723	0.7		Total BMW	35,136	0.8
	Total General Motors	34,037	0.8	TENNESSEE		417,781	9.9
Georgetown	Toyota Avalon	33,074	0.8	Spring Hill	Saturn Ion	110,902	2.6
	Toyota Camry	355,119	9.2		Total General Motors	110,902	2.6
	Toyota Solara	49,247	1.2	Smyrna	Nissan Altima	219,750	5.2
	Total Toyota	470,440	11.1		Nissan Maxima	87,129	2.1
MICHIGAN		1,259,170	29.8		Total Nissan Motor Mfg	306,879	7.3
Flat Rock	Ford Mustang	41,925	1.0	TOTAL CARS		4,229,825	100.0
	Mazda6	81,338	2.2	TOP STATES IN CALENDAR 2004 U.S. PRODUCTION			
	Total AutoAlliance	123,264	3.2	Rank	Cars	Rank	Trucks
Detroit	Dodge Viper	2,468	0.1	1 Michigan	1,259,170	1 Michigan	1,338,218
Sterling Heights	Chrysler Sebring Convertible	39,388	0.9	2 Ohio	797,009	2 Missouri	1,228,300
	Chrysler Sebring Sedan	77,268	1.8	3 Kentucky	504,477	3 Ohio	943,622
	Dodge Stratus Sedan	80,792	2.1	4 Tennessee	417,781	4 Indiana	874,284
	Total Chrysler Group	209,918	5.0	5 Illinois	346,130	5 Kentucky	858,352
Dearborn	Ford Mustang	69,704	1.6				

SOURCE Ward's AutoInfoBank

PRODUCTION

Truck Production by City and State

TRUCK PRODUCTION BY CITY AND STATE, 2004

State/City	Model	Units	Percent	State/City	Model	Units	Percent
ALABAMA		263,300	9.5	Canton	Infiniti QX56	16,328	0.2
Lincoln	Honda Odyssey	151,591	2.0		Nissan Armada	39,976	0.6
	Honda Pilot	27,509	0.4		Nissan Quest	47,113	0.6
	Total Honda	179,700	2.3		Nissan Titan	104,045	1.3
Venue	Mercedes M-Class	73,500	1.3		Total Nissan	207,498	2.7
	Total Mercedes	73,500	1.8	MISSOURI		1,228,500	16.9
CALIFORNIA		143,982	1.9	St. Louis North	Dodge Ram Pickup	73,289	2.2
Fremont	Toyota Tacoma	143,281	1.9	St. Louis South	Chrysler Town & Country	35,004	0.6
	Total Nissan	143,281	1.9		Dodge Caravan	166,509	2.2
Long Beach	Mini Truck	671	—		Total Chrysler Group	376,282	4.9
	Total Toyota	671	—	Kansas City 1	Ford Escape	188,080	2.6
DELAWARE		180,703	2.1		Mazda Tribute	46,716	0.6
Newark	Dodge Durango	180,703	2.1	Kansas City 2	Ford F-Series	248,242	3.2
	Total Chrysler Group	180,703	2.1	St. Louis	Ford Explorer	133,530	1.7
GEORGIA		180,148	2.1		Lincoln Aviator	25,555	0.3
Doraville	Buck Terraza	4,918	0.1		Mercury Mountaineer	23,943	0.3
	Chevrolet Uplander	18,879	0.2	Wentzville	Total Ford	677,574	8.6
	Chevrolet Venture	70,500	0.9		Chevrolet Express	124,566	1.6
	Oldsmobile Silhouette	2,209	—		GMC Savana	48,878	0.6
	Pontiac Montana	46,530	0.6		Total General Motors	173,644	2.2
	Pontiac Montana SV6	10,107	0.1	NEW JERSEY		36,167	0.5
	Saturn Relay	7,705	0.1	Edison	Ford Ranger	8,402	0.1
	Total General Motors	180,148	2.1		Mazda Pickup	4,269	0.1
ILLINOIS		30,898	0.7		Total Ford	10,691	0.1
Chicago	Ford Freestyle	26,954	0.4	Linden	Chevrolet Blazer	24,628	0.3
	Total Ford	26,954	0.4		Chevrolet S10	626	—
Normal	Mitsubishi Endeavor	21,744	0.3		GMC Jimmy	2,928	—
	Total Mitsubishi	21,744	0.3		GMC Sonoma	172	—
INDIANA		674,254	8.7		Total General Motors	28,586	0.4
Mishawaka	Hummer H1	237	—	OHIO		943,622	12.3
	Hummer H2	32,597	0.4	Toledo	Jeep Wrangler	75,787	1.0
	Total AM General	32,834	0.4		Jeep Wrangler Unlimited	21,914	0.3
Fort Wayne	Chevrolet Silverado	193,228	2.5	Toledo North	Jeep Liberty	224,067	2.9
	GMC Sierra	53,813	0.7	Avon Lake	Total Chrysler Group	351,788	4.2
	Total General Motors	247,041	3.2		Ford Escape	25,335	0.3
Lafayette	Isuzu Ascent	1,840	—	Lorain	Mercury Mariner	17,514	0.2
	Isuzu Rodeo	11,310	0.1		Ford Econoline	201,318	2.6
	Subaru Baja	7,252	0.1	Moraine	Total Ford	344,286	3.6
	Total Subaru	20,402	0.3		Buick Rainier	21,534	0.3
Princeton	Toyota Sequoia	82,040	0.8		Chevrolet TrailBlazer	206,382	2.7
	Toyota Sienna	188,343	2.4		GMC Envoy	81,785	1.1
	Toyota Tundra	122,634	1.6		Isuzu Ascender	7,939	0.1
	Total Toyota	374,017	4.8		Oldsmobile Bravada	500	—
KENTUCKY		686,392	8.5	East Liberty	Total General Motors	390,880	4.2
Kentucky Truck	Ford Excursion	19,541	0.3		Honda Element	56,735	0.7
	Ford F-SuperDuty	375,627	4.9		Total Honda	56,735	0.7
Louisville	Ford Explorer	237,360	3.1	OKLAHOMA		133,779	1.7
	Mercury Mountaineer	25,624	0.3	Oklahoma City	Chevrolet TrailBlazer EXT	76,484	1.0
	Total Ford	686,392	8.5		GMC Envoy XL	41,171	0.5
LOUISIANA		217,148	2.8		GMC Envoy XUV	12,390	0.2
Shreveport	Chevrolet Colorado	170,625	2.2		Isuzu Ascender EXT	3,784	—
	GMC Canyon	46,524	0.6		Total General Motors	133,779	1.7
	Total General Motors	217,148	2.8	SOUTH CAROLINA		108,780	1.4
MARYLAND		48,058	0.6	Spartanburg	BMW X5	108,780	1.4
Baltimore	Chevrolet Astro	38,342	0.5		Total BMW	108,780	1.4
	GMC Safari	10,714	0.1	TENNESSEE		295,785	3.8
	Total General Motors	48,058	0.6	Spring Hill	Saturn Vue	100,208	1.3
MICHIGAN		1,338,211	17.9		Total General Motors	100,208	1.3
Detroit	Jeep Grand Cherokee	194,227	2.5		Nissan Frontier	83,631	1.1
Warren	Dodge Dakota	128,112	1.7		Nissan Pathfinder	25,306	0.3
	Dodge Ram Pickup	159,131	2.1		Nissan Xterra	71,687	0.9
	Total Chrysler Group	482,470	6.2		Total Nissan	180,627	2.3
Dearborn Truck	Ford F-Series	89,550	1.2	TEXAS		302,841	2.5
Detroit Wayne	Ford Cheate	10,530	0.1	Arlington	Cadillac Escalade	40,437	0.5
	Ford Expedition	172,008	2.2		Chevrolet Suburban	3,728	—
	Lincoln Navigator	38,489	0.5		Chevrolet Tahoe	119,195	1.5
	Total Ford	319,677	4.0		GMC Yukon	35,799	0.5
Flint No 1	Chevrolet Silverado	123,651	1.6		GMC Yukon XL	3,684	—
	GMC Sierra	47,439	0.6		Total General Motors	302,841	2.6
Flint No 3	Chevrolet Kodiak	18,084	0.2	VIRGINIA		236,688	3.1
	GMC Topkick	17,624	0.2	Norfolk	Ford F-Series	238,688	3.1
	Isuzu Truck	657	—		Total Ford	238,688	3.1
	Chevrolet 3500	18,344	0.2	WISCONSIN		218,974	2.8
Lansing (Cra't Center)	Cadillac SRX	35,725	0.5	Janesville	Chevrolet Suburban	33,692	0.5
Lansing (Grand River)	Chevrolet Silverado	213,523	2.8		Chevrolet Tahoe	72,348	0.9
Pontiac East	GMC Sierra	75,264	1.0		Chevrolet W4 Trailblazer	1,808	—
	Total General Motors	648,071	7.1		GMC W4 Forward	448	—
MINNESOTA		148,893	1.9		GMC Yukon	62,387	0.8
Twin Cities	Ford Ranger	144,808	1.8		GMC Yukon XL	45,450	0.6
	Mazda Pickup	4,087	0.1		Isuzu W4 NPR	1,982	—
	Total Ford	148,893	1.8		Total General Motors	218,974	2.8
MISSISSIPPI		307,482	2.7		Other Medium/Heavy Trucks	573,448	7.5
				TOTAL TRUCKS		7,790,789	100.0

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To present the 2006 edition of *Ward's Motor Vehicle Facts & Figures*, reference book documents the performance and impact of the U.S. charts, graphs and statistical tables on topics including production, exports, trade, ownership, accidents and government regulations.

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Car Production by Make and State

U.S. CAR PRODUCTION BY MAKE BY STATE, 2005

State/City	Model	Units	Percent	State/City	Model	Units	Percent
ALABAMA		91,218	2.1		Total Chrysler Group	199,236	4.6
Montgomery	Hyundai Sonata	91,218	2.1	Wayne	Ford Focus	188,991	3.9
	Total Hyundai	91,218	2.1	Wuxom	Ford GT	1,898	—
CALIFORNIA		248,438	5.7		Ford Thunderbird	4,868	0.1
Fremont	Pontiac Vibe	82,319	1.4		Lincoln LS	15,675	0.4
	Toyota Corolla	186,119	4.3		Lincoln Town Car	50,284	1.2
	Total NUMMI	248,438	5.7		Total Ford	239,716	5.6
DELAWARE		9,387	0.2	Hamtramck	Buick LeSabre	51,873	1.2
Wilmington	Pontiac Solstice	9,382	0.2		Buick Lucerne	21,895	0.5
	Saturn L-Series	5	—		Cadillac DeVille	27,554	0.6
	Total General Motors	9,387	0.2		Cadillac DTS	36,360	0.8
GEORGIA		183,589	4.5		Pontiac Bonneville	5,119	0.1
Atlanta	Ford Taurus	180,484	4.2	Lansing	Chevrolet Classic	42,349	1.0
	Mercury Sable	13,085	0.3		Pontiac Grand Am	35,089	0.8
	Total Ford	193,569	4.5	Lansing (Grand River)	Cadillac CTS	65,204	1.6
ILLINOIS		342,692	7.9		Cadillac STS	38,559	0.8
Belvidere	Chrysler Neon	805	—	Onon	Pontiac G6	157,414	3.6
	Dodge Neon	125,791	2.9		Total General Motors	479,216	11.1
	Total Chrysler Group	126,596	2.9	MISSISSIPPI		133,109	3.1
Chicago	Ford Five Hundred	118,740	2.7	Canton	Nissan Altima	133,109	3.1
	Mercury Montego	32,822	0.8		Total Nissan	133,109	3.1
	Total Ford	151,562	3.5	OHIO		882,222	20.4
Normal	Chrysler Sebring Coupe	348	—	Lordstown	Chevrolet Cobalt	279,711	6.5
	Dodge Stratus Coupe	1,427	—		Pontiac Pursuit	21,448	0.6
	Mitsubishi Eclipse	28,220	0.7		Total General Motors	301,169	7.0
	Mitsubishi Galant	34,939	0.8	East Liberty	Honda Accord	5,460	0.1
	Total Mitsubishi	64,834	1.8		Honda Civic	133,724	3.1
INDIANA		87,151	2.0	Marysville	Acura TL	88,545	2.0
Lafayette	Subaru Legacy	87,151	2.0		Honda Accord	353,334	8.2
	Total Subaru	87,151	2.0		Total Honda	581,063	13.4
KANSAS		212,049	4.9	SOUTH CAROLINA		19,830	0.5
Fairfax	Chevrolet Malibu	212,049	4.9	Spartanburg	BMW Z4	19,830	0.5
	Total General Motors	212,049	4.9		Total BMW	19,830	0.5
KENTUCKY		550,801	12.7	TENNESSEE		380,216	8.3
Bowling Green	Cadillac XLR	3,525	0.1	Spring Hill	Saturn Ion	110,073	2.5
	Chevrolet Corvette	37,949	0.9		Total General Motors	110,073	2.5
	Total General Motors	41,474	1.0	Smyrna	Nissan Altima	173,370	4.0
Georgetown	Toyota Avalon	108,837	2.5		Nissan Maxima	76,773	1.8
	Toyota Camry	356,487	8.2		Total Nissan Motor Mfg	250,143	5.8
	Toyota Solara	43,993	1.0	TOTAL CARS		4,321,272	100.0
	Total Toyota	509,317	11.8				
MICHIGAN		1,190,800	27.6	TOP STATES IN CALENDAR 2005 U.S. PRODUCTION			
Flat Rock	Ford Mustang	198,418	4.6	Rank	Cars	Rank	Trucks
	Mazda6	74,216	1.7	1 Michigan	1,190,800	1 Michigan	1,325,833
	Total AutoAlliance	272,632	6.3	2 Ohio	882,222	2 Missouri	1,147,977
Detroit	Dodge Viper	2,025	—	3 Kentucky	550,801	3 Ohio	912,367
Sterling Heights	Chrysler Sebring Convertible	34,439	0.8	4 Tennessee	380,216	4 Indiana	685,820
	Chrysler Sebring Sedan	82,255	1.4	5 Illinois	342,692	5 Kentucky	601,278
	Dodge Stratus Sedan	100,517	2.3				

SOURCE: Ward's AutoInfoBank.

PRODUCTION

Truck Production by Make and State

U.S. TRUCK PRODUCTION BY MAKE BY STATE, 2005

State/City	Model	Units	Percent	State/City	Model	Units	Percent
ALABAMA							
Lincoln	Honda Odyssey	388,247	5.1		Mazda Pickup	7,834	0.1
	Honda Pilot	204,897	2.7		Total Ford	128,484	1.7
	Total Honda	87,792	1.2	MISSISSIPPI			
Vance	Mercedes M-Class	282,688	3.8	Canton	Infiniti QX56	208,101	2.7
	Mercedes R-Class	77,014	1.0		Nissan Armada	17,388	0.2
	Total Mercedes	18,544	0.2		Nissan Quest	50,385	0.7
		68,868	1.3		Nissan Quest	40,563	0.5
CALIFORNIA					Nissan Titan	98,775	1.3
Fremont	Toyota Tacoma	173,832	2.3		Total Nissan	208,101	2.7
	Total NUMMI	168,831	2.2	MISSOURI			
Long Beach	Hino Truck	5,001	0.1	St. Louis North	Dodge Ram Pickup	1,147,977	15.1
	Total Toyota	5,001	0.1	St. Louis South	Chrysler Town & Country	147,400	1.9
DELAWARE					Dodge Caravan	61,367	0.8
Newark	Dodge Durango	108,875	1.4		Total Chrysler Group	188,258	2.4
	Total Chrysler Group	108,875	1.4	Kansas City 1	Ford Escape	388,025	5.2
GEORGIA					Mazda Tribute	215,371	2.8
Doraville	Buck Terra	188,872	2.6		Mercury Mariner	40,877	0.5
	Chevrolet Uplander	26,070	0.3	Kansas City 2	Ford F-Series	9,038	0.1
	Pontiac Montana SV6	108,223	1.4	St. Louis	Ford Explorer	228,744	3.0
	Saturn Relay	48,798	0.6		Lincoln Aviator	52,988	0.7
	Total General Motors	15,881	0.2		Mercury Mountaineer	9,716	0.1
		188,872	2.6		Total Ford	10,037	0.1
ILLINOIS				Wentzville	Chevrolet Express	688,571	7.4
Chicago	Ford Freestyle	112,570	1.5		GMC Savana	144,545	1.9
	Total Ford	89,910	1.2		Total General Motors	41,836	0.5
Normal	Mitsubishi Endeavor	22,680	0.3	NEW JERSEY			
	Total Mitsubishi	22,680	0.3	Lincoln	Chevrolet Blazer	188,381	2.4
INDIANA					GMC Jimmy	14,489	0.2
Mishawaka	Hummer H1	688,820	9.0		Total General Motors	14,489	0.2
	Hummer H2	443	—	OHIO			
	Total All General	27,808	0.4	Toledo	Jeep Wrangler	912,387	12.0
Fort Wayne	Chevrolet Silverado	28,291	0.4		Jeep Wrangler Unlimited	74,781	1.0
	GMC Sierra	198,747	2.6	Toledo North	Jeep Liberty	21,500	0.3
	Total General Motors	84,013	0.8		Total Chrysler Group	220,718	2.9
Lafayette	Subaru B9 Tribeca	280,780	3.4	Avon Lake	Mercury Mariner	317,089	4.2
	Subaru B9	27,481	0.4	Lorain	Ford Econoline	27,061	0.4
	Total Subaru	4,369	0.1		Total Ford	203,071	2.7
Princeton	Toyota Sequoia	31,840	0.4	Moraine	Buick Rainier	280,132	3.0
	Toyota Sienna	44,848	0.6		Chevrolet TrailBlazer	12,288	0.2
	Toyota Tundra	192,701	2.5		GMC Envoy	201,788	2.8
	Total Toyota	127,420	1.7		Isuzu Ascender	74,888	1.0
KENTUCKY					Saab 9-7X	4,251	0.1
Kentucky Truck	Ford Excursion	384,989	4.8		Total General Motors	5,785	0.1
	Ford F-SuperDuty	801,278	7.9	East Liberty	Honda Element	289,020	3.9
Louisville	Ford Explorer	15,267	0.2		Total Honda	88,116	0.9
	Mercury Mountaineer	383,971	5.2	OKLAHOMA			
	Total Ford	174,517	2.3	Oklahoma City	Chevrolet TrailBlazer EXT	88,116	0.9
LOUISIANA					GMC Envoy XL	89,244	1.3
Shreveport	Chevrolet Colorado	17,533	0.2		GMC Envoy XUV	61,149	0.8
	GMC Canyon	801,278	7.9		Isuzu Ascender EXT	33,520	0.4
	Hummer H3	208,942	2.7	SOUTH CAROLINA			
	Isuzu I-Series	119,872	1.6	Spartanburg	BMW X5	1,985	—
	Total General Motors	53,271	0.7		Total BMW	99,244	1.3
MARYLAND							
Baltimore	Chevrolet Astro	3,168	—		Saturn Vue	104,886	1.4
	GMC Safari	208,942	2.7	TENNESSEE			
	Total General Motors	18,823	0.2	Spring Hill	BMW X5	104,886	1.4
MICHIGAN					Total BMW	104,886	1.4
Detroit	Jeep Commander	18,823	0.2		Saturn Vue	332,884	4.4
	Jeep Grand Cherokee	14,501	0.2		Total General Motors	88,326	1.2
Warren	Dodge Dakota	4,022	0.1		Nissan Frontier	71,514	0.9
	Dodge Ram Pickup	18,823	0.2		Nissan Pathfinder	94,487	1.2
	Mitsubishi Raider	1,325,833	17.4		Nissan Xterra	78,677	1.0
	Total Chrysler Group	223,824	2.9	TEXAS	Total Nissan	244,688	3.2
Dearborn Truck	Ford F-Series	107,033	1.4	Arlington	Cadillac Escalade	188,808	2.0
	Lincoln Mark LT	114,751	1.5		Chevrolet Suburban	29,379	0.4
	Ford Chassis	9,518	0.1		Chevrolet Tahoe	788	—
Detroit	Ford Expedition	509,608	6.7		GMC Yukon	95,587	1.3
Wayne	Lincoln Navigator	181,589	2.5		GMC Yukon XL	28,985	0.4
	Total Ford	15,710	0.2	VIRGINIA			
Flint No 1	Chevrolet Silverado	8,861	0.1	Norfolk	Ford F-Series	213,984	2.8
	GMC Sierra	107,594	1.4		Total Ford	213,984	2.8
Flint No 3	Chevrolet Kodiak	31,108	0.4	WISCONSIN			
	GMC Topkick	384,840	4.7	Janesville	Chevrolet Suburban	189,190	2.1
	Isuzu Truck	127,344	1.7		Chevrolet Tahoe	22,842	0.3
Lansing (Craft Center)	Chevrolet SSR	48,722	0.6		Chevrolet Trailmaster	2,011	—
Lansing (Grand River)	Cadillac SRX	15,890	0.2		GMC W4 Forward	484	—
Pontiac East	Chevrolet Silverado	23,686	0.3		GMC Yukon	43,809	0.6
	GMC Sierra	1,076	—		GMC Yukon XL	45,388	0.6
	Total General Motors	3,483	—		Isuzu NPR	2,178	—
MINNESOTA					Total General Motors	188,190	2.1
Twin Cities	Ford Ranger	481,887	6.1	Other Medium/Heavy Truck		328,857	4.3
		128,484	1.7	TOTAL TRUCKS		7,825,381	100.0
		118,680	1.6				

SOURCE: Ward's AutoInfoBank

Automotive News

APRIL 2, 2007

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2007

DATA

NORTH AMERICA PRODUCTION

F.D. No. 34040

Public Use Only

Year	January	February	March	April	May	June	July	August	September	October	November	December	Total
2006	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	52,560
2007	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	4,380	52,560

North America production

Although Michigan remains first in the number of light vehicles built, production has dropped 6,39,116 units compared with 2002

Alabama has gained 501,795 production units since 2002, more than any other state. In 2002, it ranked No 14, in 2006, it ranked No 6. General Motors' Spring Hill, Tenn., plant will be on changeover for an extended period as it is remodeled from two lines to one. GM's Oshawa (Ontario) line 1

and 2 will undergo a similar overhaul at the end of 2007, readying the plant to build the new Chevrolet Camaro in late 2008

Virginia will lose its only automotive plant in June when Ford's Norfolk plant shuts down. Minnesota also will lose its only auto plant when Ford closes its St Paul operation in the spring of 2008. Both plants opened in 1925

Several new manufacturers will begin production in

the next few years. Nanjing Automobile Group plans to begin building MG IFs in September 2008 in Ardmore, Okla. Kia will open its first U.S. plant in late 2009 in West Point, Ga., where the Sorento will be built

Toyota will build two more plants in the next several years. It's new plant in Woodstock, Ontario, will start building Toyota RAV4s in 2008, and a plant in Blue Springs, Miss., will start building Toyota Highlanders in 2010

U.S. car and light-truck production by state

	2006 production	2006 light-vehicle production	2006 share of U.S. light-vehicle production	2006 share of U.S. light-vehicle production
2 Ohio	1,669,741	1,794,589	15.3	15.4
4 Missouri	984,353	1,147,977	9.0	9.9
6 Alabama	698,086	479,465	6.4	4.1
8 Illinois	470,322	455,262	4.3	3.9
10 Georgia	303,012	392,531	2.8	3.4
12 Texas	237,010	155,606	2.2	1.3
14 Wisconsin	215,078	159,190	2.0	1.4
16 Virginia	133,437	213,994	1.2	1.8
18 Delaware	119,067	119,263	1.1	1.0
20 Oklahoma	17,572	99,244	0.2	0.9
22 New Jersey	-	14,489	-	0.1
U.S. total light-vehicle production	10,915,248	11,634,834	100.0	100.0
Canada total light-vehicle production	2,497,637	2,623,071		
Mexico total light-vehicle production	1,963,197	1,603,390		
Total N.A. light-vehicle production	15,376,082	15,861,095		

Source: Automotive News Data Center

North America plant closings and new plants

Manufacturer	Location	Models	Status
Chrysler	July '06	Jeep Wrangler, Dodge Sprinter	moved to Toledo Supplier Park facility model discontinued moved to Jackson, S.C.
Ford	Oct. '06		
March '06	St. Louis (South)	Ford Explorer, Mercury Mountaineer	added to Louisville, Ky. added to Louisville, Ky. model discontinued
Oct. '06	Atlanta	Ford Taurus	to move to St. Thomas, Ontario
May '07	Wisconsin	Lincoln Town Car	to move to Dearborn, Mich.
June '07	Norfolk, Va.	Ford F-series	moved to undisclosed location
Spring '08	Twin Cities (St. Paul, Minn.)	Ford Ranger, Mazda B-series	moved to undisclosed location
GM			
Feb. '06	Oklahoma City	Chevrolet TrailBlazer EXT, GMC Envoy XL, Isuzu Ascender EXT	all models discontinued
March '06	Lansing (Mich.)	Chevrolet SSR	model discontinued
Chrysler group			
July '06	Toledo (Ohio) Supplier Park	Jeep Wrangler, Wrangler Unlimited 4-door	moved from Toledo South new model moved from Gaffney, S.C.
Nov. '06	Lansing, S.C.	Dodge Sprinter	
Oct. '06	Lansing (Mich.) Delta	GMC Acadia, Saturn Outlook, Buick Encore	new models
Kia			
2009	West Point, Ga.	Kia Sorento	production shift from Korea
Nanjing			
Sept. '08	Ardmore, Okla.	MG TF coupe & roadster, MG ZT (Fall '08), MG ZS (2010)	all models new to the United States
Toyota			
Nov. '08	San Antonio	Toyota Tundra	additional facility for Tundra production shift from Japan
2008	Woodstock, Ontario	Toyota RAV4	production shift from Japan
2010	Blue Springs, Miss.	Toyota Highlander	production shift from Japan

*Permanent layout

Source: Automotive News Data Center

Michigan Car And Truck Production Numbers

2002

1,792,720 cars

1,125,611 trucks

2,918,331 total

2003

1,528,101

1,255,738

2,783,839 total

2004

1,259,170

1,339,218

2,598,388 total

2005

1,190,800

1,325,833

2,516,633 total

2006 (cars and trucks combined)

2,279,672 total

78%

**Excerpts from
CODE OF ORDINANCES
CITY OF
RIVERVIEW, MICHIGAN**

Sec. 74-131. Defined.

The term "noxious weeds" shall include Canadian Thistle, dodders, mustard, wild carrot, bind weed, perennial sowthistle, hoary alyssum, ragweed, goldenrod, poison ivy, poison sumac, and any other weeds and grass over one foot high which may create a condition detrimental to the public health and welfare.

Sec. 74-132. Violations and penalty.

Except as stated otherwise in this article, violations of this article are a municipal civil infraction for which a person is responsible for a civil fine of \$50 00

Sec. 74-133. Prohibition of noxious weeds; exceptions.

No owner of any lot, place, or area within the city, or the agent of such owner, shall permit on such lot, place, or area, or upon any sidewalk abutting the lot, place or area within the city, any noxious weeds, as defined in section 74-131, that may be growing, lying or located thereon, provided, however, that such growth shall be permitted if it shall not encroach closer than 50 feet of any public highway, street, sidewalk, adjoining lot or premises

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of May, 2007, a copy of this Reply to the City of Riverview's Petition to Revoke of Riverview Trenton Railroad Company was served upon all parties of record by facsimile and first class mail, postage prepaid.

A handwritten signature in black ink, appearing to read "David H. Coburn", written over a horizontal line.

David H. Coburn