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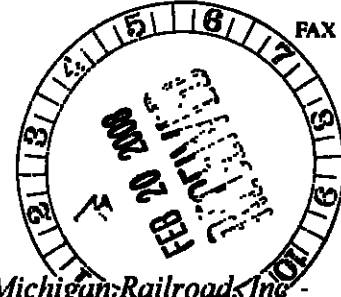
LAW OFFICES OF
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February 20, 2008

221650

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Honorable Anne K. Quinlan
Acting Secretary
Surface Transportation Board
395 E Street, S.W.
Washington, D. C. 20423



RE: Docket No. AB-364 (Sub-No. 14X). *Mid-Michigan Railroad, Inc.*
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties,
MI

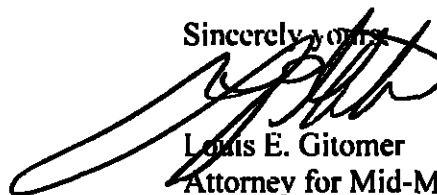
Dear Acting Secretary Quinlan:

Enclosed are the original and 10 copies of a Petition for Exemption for the Mid-Michigan Railroad, Inc. ("MMRR") to abandon a 26.40-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI. Also enclosed are a check from MMRR for the filing fee of \$5,400, and a computer diskette containing the Petition in Word and pdf format. All of the color Exhibits are attached to the end of the Petition in Exhibit J.

Please time and date stamp the additional copy of this letter and the Petition and return them with our messenger. Thank you for your assistance.

If you have any questions please call or email me.

Sincerely yours



Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

Enclosures

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**SURFACE
TRANSPORTATION BOARD**

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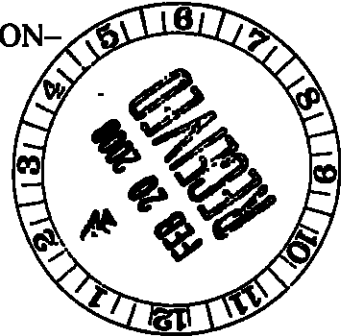
BEFORE THE
SURFACE TRANSPORTATION BOARD

221650

Docket No AB-364 (Sub-No. 14X)

MID-MICHIGAN RAILROAD, INC.-ABANDONMENT EXEMPTION-
IN KENT, IONIA, AND MONTCALM COUNTIES, MI

PETITION FOR EXEMPTION



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**SURFACE
TRANSPORTATION BOARD**

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Attorneys for: MID-MICHIGAN
RAILROAD, INC.

Dated: February 20, 2008

BEFORE THE
SURFACE TRANSPORTATION BOARD

Docket No. AB-364 (Sub-No. 14X)

MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT, IONIA, AND MONTCALM COUNTIES, MI

PETITION FOR EXEMPTION

Mid-Michigan Railroad, Inc. ("MMRR") petitions the Surface Transportation Board ("Board") to exempt, under 49 U.S.C. § 10502, MMRR's abandonment of a 24.70-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI (the "Line") from the prior approval requirements of 49 U.S.C. §§ 10903 and 10904.¹ MMRR also requests the Board to establish a procedural schedule.

Abandonment will allow MMRR to avoid costs incurred by continued ownership of the Line. MMRR has entered a Memorandum of Understanding (the "MOU") to sell the Line to West Michigan Trails and Greenways Coalition ("WMTGC") for interim trail use/rail banking. No traffic moved over the Line in 2007, and none has moved over the Line to date in 2008. Crop Production Services ("CPS")², the last shipper on the Line, received one shipment in December 2006. There is no longer a demand for rail service.

¹ The Board rejected the same abandonment for omitting an affected county. *Mid-Michigan Railroad, Inc. —Abandonment Exemption—in Kent and Montcalm Counties, MI*, STB Docket No. AB-364 (Sub-No. 11X) (STB served January 25, 2008) ("MMRR1"). In the instant Petition, MMRR has included Ionia County and provided the required notice.

² 6288 South Greenville Road, Greenville, MI 48838, Milepost 79.8.

PROPOSED TRANSACTION

MMRR proposes to abandon the 24.7-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI. The Line traverses Zip Codes 48809, 48838, 48887, and 49331. A colored map of the Line is attached as Exhibit A (and at the end of this pleading). Exhibit B consists of the Combined Environmental and Historic Report. The draft Federal Register Notice is in Exhibit C, and copies of the newspaper publication and the required certification are in Exhibit D. The certificate of service is in Exhibit E. Exhibit F contains the Verified Statement of Mark D. Garvin, Chief Engineer for all of the subsidiary railroads of RailAmerica, Inc. Mr. Garvin addresses that value of the track and material on the Line, the need for rehabilitation, and the cost of maintenance. Exhibit G contains the Verified Statement of Mr. Robert M. Frelich, Jr., and addresses the costs of operating over the Line. In Exhibit H, Mr. Todd N. Cecil, Vice President-Real Estate, presents the value of the real estate. In Exhibit I, Mr. Robert Dine concludes that no traffic has moved over the Line since 2006 and that shippers currently served in Lowell are not located on the Line and will continue to receive service.

Based on information in MMRR's possession, the Line does not contain federally granted right-of-way. Any documentation in MMRR's possession concerning title will be made available to those requesting it. There are stations at Lowell, Belding, and Greenville.

BACKGROUND

MMRR acquired the Line from CSX Transportation, Inc. and began operating in 1987.³ In the first full year of operations, the Line generated about 3,500 carloads. Traffic on the Line

³ *Mid-Michigan Railroad, Inc.—Acquisition and Operation Exemption—CSX Transportation, Inc.*, ICC Finance Docket No. 31189 (ICC served January 7, 1988)

has declined to the point where no traffic moved in 2007 and no traffic has moved to date in 2008

Prior to April 2006, Frigidaire Corporation ("Frigidaire") was an active shipper on the Line. Through March 2006, Frigidaire had made 98 shipments on the Line. In 2005 Frigidaire had made 1,002 shipments on the Line and in 2004 Frigidaire made 846 shipments on the Line. Frigidaire closed its facility on the Line in April 2006 and moved the manufacturing to Mexico and South Carolina. Frigidaire has not shipped over the Line since March 2006. MMRR does not expect Frigidaire to use the Line in the future.

CPS made one shipment over the Line in December 2006. CPS did not use the Line in 2007 or 2008 to date, nor has any other shipper.⁴ Therefore, MMRR is projecting Forecast Year traffic at one car per year by excluding the Frigidaire traffic that has been permanently diverted from the Line and including the CPS traffic.

The Line did not generate any freight in 2007. The Line is listed as Federal Railroad Administration ("FRA") Class I track. As described below, abandoning the Line will permit MMRR to save (1) rehabilitation costs of \$125,000, (3) the annual maintenance costs of the Line of \$123,500 and (4) opportunity costs of \$656,811. MMRR will salvage the track and materials, which have an estimated net liquidation value of \$2,460,077. In addition, MMRR intends to sell the Line for interim trail use/rail banking to WMTGC. The value of the real estate is about \$1,288,000 based on the negotiations conducted by Mr. Cecil (See Exhibit H) and Mr. Cecil's expert analysis of the valuation of real estate.

Upon receipt of abandonment authority, MMRR plans to salvage the track and materials on the Line, but leave the ties, bridges, and culverts necessary for interim trail use/rail banking in

place as per the MOU with WMTGC. Some of the track and materials will be sold as scrap and the remainder will be used by MMRR and its railroad affiliates. MMRR will sell the real estate to WMTGC to convert the active rail line to interim trail use/rail banking.

A. There is no traffic on the Line.

Traffic on the Line has seen a precipitous decrease since MMRR acquired the Line. In its first year of operation in 1988, the Line generated about 3,500 carloads. There was no traffic on the Line in 2007 and none to date in 2008. The last carload on the Line moved in December 2006. Frigidaire, the largest shipper on the Line, closed its facility in April 2006 and stopped using the Line.

Because of the lack of traffic, MMRR is burdened with retaining a rail line that does not generate any rail freight revenue.

B. MMRR will incur costs to rehabilitate the Line.

The Line is currently in FRA Class I condition. Since there has been no traffic over the Line since December 2006, MMRR has deferred maintenance on the Line. In his attached Verified Statement, Mr. Garvin explains that to keep the Line in FRA Class I condition, MMRR will be required to make \$125,000 in capital expenditures to rehabilitate the Line.

C. MMRR will incur costs to maintain the Line.

The Line is 24.70 miles in length. The Board has accepted a range of normalized maintenance of way costs of between \$4,300 and \$6,000 in recent decisions⁴ MMRR will adopt

⁴ MMRR has served a copy of this Petition on CPS.

⁵ *Wisconsin Central Ltd –Abandonment–in Ozaukee, Sheboygan and Manitowoc Counties, WI*, STB Docket No. AB-303 (Sub-No. 27), STB served October 18, 2004, at 8; and *Minnesota Northern Railroad, Inc –Abandonment Exemption–in Polk and Norman Counties, MN*, STB Docket No. AB-497 (Sub-No. 3x) (STB served December 4, 2006), at 2

a conservative annual normalized maintenance cost of \$5,000 per mile⁶ Mr. Garvin has reviewed an annual average \$5,000 per mile normalized maintenance cost and found it to be in line with the maintenance costs incurred across the MMRR. Therefore, after MMRR makes the expenditure to eliminate deferred maintenance on the Line, MMRR will incur annual maintenance costs for the Line of about \$123,500.

D. Calculation of opportunity costs.

Opportunity costs (or total return on value of road property) reflect the economic loss experienced by a carrier from forgoing a more profitable alternative use of its assets. Under *Abandonment Regulations—Costing*, 3 I.C.C.2d 340 (1987), the opportunity cost of road property is computed on an investment base equal to the sum of: (1) allowable working capital; (2) the net liquidation value (NLV) of the line; and (3) current income tax benefits (if any) resulting from abandonment. The investment base (or valuation of the road properties) is multiplied by the current nominal rate of return, to yield the nominal return on value. The nominal return is then adjusted by applying a holding gain (or loss) to reflect the increase (or decrease) in value a carrier will expect to realize by holding assets for 1 additional year.⁷

1. Calculation of net salvage value (“NSV”).

Mr. Garvin is responsible for the development of maintenance and rehabilitation plans for RailAmerica’s subsidiary railroads. Based on MMRR’s records, an inspection of the Line, the latest costs of rail materials, and the cost of removal and transportation, Mr. Garvin calculates the NSV of the Line to be \$2,460,077 (See Exhibit 1 and the Exhibit thereto)

2. Calculation of the value of real estate (“VRE”).

The VRE has been calculated by Mr Cecil to be \$1,288,000, based on the MOU and Mr Cecil’s vast experience. Hence, the net liquidation value (“NLV”) of the Line is \$3,748,077.

⁶ *Central Michigan Railway Company—Abandonment Exemption—in Saginaw County, MI*, STB Docket No. AB-308 (Sub-No. 3X) (STB served October 31, 2003), at 5.

⁷ *Wisconsin Central Ltd—Abandonment—in Ozaukee, Sheboygan and Manitowoc Counties, WI*, STB Docket No. AB-303 (Sub-No. 27) (STB served October 18, 2004), at 10-11.

3. Calculation of 15 days working capital.

Mr. Frelich calculated the cost of operating the Line to be \$1,410 per year. Working capital for the computation of opportunity costs is calculated as 15 days of the costs of the Line. Therefore, MMRR has totaled the operating costs and maintenance costs (\$124,910), divided them by 365 and multiplied that amount by 15 to arrive at the 15 days of working capital of \$5,133.

4. Nominal cost of capital.

The Board has recently accepted the nominal cost of capital for a Class III railroad of 17.50 percent.⁸ Therefore, MMRR has decided to use 17.50 percent as the nominal cost of capital in calculating the opportunity costs of the Line.

5. Income tax consequences.

The book value of the Line is \$3,748,077. The NLV of \$3,748,077 less the book value yields no gain. Therefore, sale of the Line will have no tax consequences.

6. Holding gain.

Because of the volatility of the market for scrap and reusable steel and the decline in the market for real estate, MMRR estimates that there will be no holding gain or loss in the current economic environment. The Board has accepted such an analysis.⁹

⁸ *Southwestern Railroad Company, Inc. – Abandonment Exemption – in Ellis County, OK, and Lipscomb, Ochiltree, and Hansford Counties, TX*, STB Docket No. AB-341 (Sub-No. 1X) (STB served November 20, 2007).

⁹ *Southwestern Railroad Company, Inc. – Abandonment Exemption – in Ellis County, OK, and Lipscomb, Ochiltree, and Hansford Counties, TX*, STB Docket No. AB-341 (Sub-No. 1X) (STB served November 20, 2007) at 2.

7. Calculation of Opportunity Costs.

The following Table shows the opportunity cost calculation.

Working Capital	\$ 5,133
NLV	\$3,748,077
Taxes	\$ 0
Holding Gain	\$ 0
Valuation	\$3,753,210
Nominal Rate of Return	17.50%
Opportunity Cost	\$ 656,811

E. Alternate transportation.

There are numerous roads crossing and paralleling the Line between Lowell and Greenville. The main highways serving the same area as the Line are Michigan Routes 21, 44, 57, and 91, as well as local roads. The limited traffic that the Line carried has found alternates to rail transportation as demonstrated by the decline in traffic. Therefore, there is alternate transportation service available.

F. Summary.

Continued ownership and operation of the Line by MMRR will continue to be a burden on MMRR and interstate commerce. MMRR will incur rehabilitation costs of \$125,000, annual maintenance costs of \$123,500, and opportunity costs of \$656,811. MMRR will be able to sell the real estate for interim trail use/rail banking for about \$1,288,000 and will be able to reuse or sell the track and materials, which is valued at about \$2,460,077. In addition, there is alternate transportation service available.

There will be minimal, if any, harm to rail shippers who have not used the Line in 2007 or 2008. Traffic has been declining over the years and dropped precipitously when Frigidaire relocated its plant from Greenville.

MMRR contends that in balancing the harm to it and interstate commerce against the harm to shippers and local interests, the balance clearly favors abandonment.

ARGUMENT SUPPORTING THE ABANDONMENT

MMRR seeks an exemption under 49 U.S.C. § 10502 from the applicable requirements of 49 U.S.C. §§ 10903 and 10904 in order to abandon the Line and convert it to interim trail use/rail banking.

Under 49 U.S.C. § 10502, the Board must exempt a transaction from regulation when it finds that:

(1) regulation is not necessary to carry out the rail transportation policy of 49 U.S.C. § 10101; and

(2) either:

(a) the transaction is of limited scope, or

(b) regulation is not necessary to protect shippers from the abuse of market power.

The legislative history of Section 10502 reveals a clear Congressional intent that the Board should liberally use its exemption authority to free certain transactions from the administrative and financial costs associated with continued regulation. In enacting the Staggers Rail Act of 1980, Pub. L. No. 96-488, 94 Stat. 1895, Congress encouraged the Board's predecessor agency to liberally use the expanded exemption authority under former Section 10505.

The policy underlying this provision is that while Congress has been able to identify broad areas of commerce where reduced regulation is clearly warranted, the Commission is more capable through the administrative process of examining specific regulatory provisions and practices not yet addressed by Congress to determine where they can be deregulated consistent with the policies of Congress. The conferees expect that, consistent with the policies of this Act, the Commission will pursue partial and complete exemption from remaining regulation.

H.R. Rep. No. 1430, 96th Cong. 2d Sess. 105 (1980). See also *Exemption From Regulation--Boxcar Traffic*, 367 I.C.C. 424, 428 (1983), vacated and remanded on other grounds, *Brae Corp v. United States*, 740 F.2d 1023 (D.C. Cir. 1984). Congress reaffirmed this policy in the conference report accompanying the ICC Termination Act of 1995, Pub. L. No. 104-88, 109 Stat. 803, which re-enacted the rail exemption provision as Section 10502. H.R. Rep. No. 422, 104th Cong., 1st Sess. 168-69 (1995).

A. The Application of 49 U.S.C. § 10903 Is Not Necessary to Carry Out the Rail Transportation Policy

Detailed scrutiny of this transaction is not necessary to carry out the rail transportation policy. An exemption would minimize the unnecessary expense associated with the preparation and filing of a formal abandonment application, expedite regulatory decisions and reduce regulatory barriers to exit. 49 U.S.C. § 10101 (2) and (7). The abandonment by MMRR will not result in a loss of rail service. CSP, the last shipper on the Line, has not used rail service over the Line since December 2006. The other shipper on the Line, Frigidaire closed its facility on the Line in March 2006 and stopped using the Line. The purchaser of the Frigidaire facility has made no arrangements for rail service.

MMRR will avoid rehabilitation costs of \$125,000, annual maintenance costs of \$123,500, and opportunity costs of \$656,811. MMRR will receive \$2,460,077 for salvaging the track and material in the Line and \$1,288,000 for the real estate. The Line will be converted to

interim trail use/rail banking. Granting this exemption, therefore, fosters sound economic conditions and encourages efficient management by permitting the rationalization of an unnecessary rail line. 49 U.S.C. § 10101 (3), (5) and (9). Other aspects of the rail transportation policy are not adversely affected. For example, competition and the continuation of a sound rail transportation system are not affected since the public will not be deprived of any needed rail services.

B. This Transaction Is Of Limited Scope

The proposed transaction is of limited scope. MMRR seeks to abandon a 24.70-mile line in three counties and two cities in Michigan.

C. This Transaction Will Not Result In An Abuse Of Market Power.

MMRR is abandoning the Line. There are no active shippers located on the Line. CPS, the only shipper on the Line, has not shipped over the Line since December 2006.

Since no shipper will lose service, MMRR does not anticipate any opposition to the proposed abandonment.

THE ABANDONMENT SHOULD BE EXEMPTED FROM THE OFFER OF FINANCIAL ASSISTANCE PROVISIONS

There has been no rail service over the Line since December 2006, when one carload moved on the Line. The main user of the Line closed its facility in April 2006. WMTGC has entered a MOU to acquire the Line from MMRR for interim trail use/rail banking. It is obvious that the Line is no longer required to provide common carrier service and there is another public use for the Line.

The Board has often observed that the offer of financial assistance ("OFA") process takes priority over converting a rail line to interim trail use/rail banking. "OFAs to acquire rail lines

for continued rail service or to subsidize rail operations take priority over interim trail use/rail banking.”¹⁰

Permitting the abandonment to become effective without application of the OFA process will minimize the need for federal regulatory control over the rail system, expedite the Board’s regulatory decisions, and reduce the regulatory barriers to exit from unprofitable rail service 49 U.S.C. § 10101(2) and (7). The Board and its predecessor, the Interstate Commerce Commission have granted exemptions from 49 U.S.C. § 10904 (previously 49 U.S.C. § 10905) (the “OFA Provisions”) where the right-of-way is needed for a valid purpose and there is no overriding public need for continued rail service.¹¹ There is a MOU for MMRR to sell the Line to WMTGC for the public purpose of converting it to interim trail use/rail banking. In the event the Line is needed for rail service in the future, the rail banked Line could be returned to rail service.

The Line has not been used since December 2006. The imposition of the OFA Provisions would delay or could completely frustrate the acquisition of the Line for the purpose of interim trail use/rail banking. The acquisition could be delayed for at least six months, if not more if this abandonment were subjected to the OFA Provisions. During this time, MMRR would continue to incur substantial opportunity costs. The Line is not needed for common carrier rail service. It is appropriate for the Board to foster the conversion of this active rail line to interim trail use/ rail banking by exempting this abandonment from the OFA Provisions. The Board has stated “We

¹⁰ *Rail Abandonments—Use of Rights-of-Way As Trails*, 2 I.C.C.2d 591, 608 (1986).

¹¹ See, *Doniphan, Kensett and Searcy Railway—Abandonment Exemption - In Searcy, White County, AR*, STB Docket No. AB-558X (STB served May 6, 1999); *Union Pacific Railroad Company—Abandonment Exemption—In Salt Lake County, UT*, STB Docket No. AB-33 (Sub-No. 116X) (STB served September 30, 1998); *K & E Railway Company—Abandonment Exemption—In Alfalfa, Garfield, and Grant Counties, OK and Barber County, KS*, STB Docket No. AB-480X (STB served December 31, 1996); and *Southern Pacific Transportation*

have granted exemptions from these provisions from time to time, when appropriate.”¹² MMRR contends that the proposal here is appropriate for an exemption from the OFA Provisions.

Because there are no longer any rail transportation customers on the Line, it is clear that the proposed exemption from 49 U.S.C. § 10904 presents no opportunity for an abuse of market power. Exemption from the OFA Provisions is also limited in scope because MMRR seeks the exemption for a 24.70-mile line in two counties and in one state, Michigan.

REQUEST FOR PROCEDURAL SCHEDULE

MMRR respectfully requests the Board to adopt a procedural schedule in this proceeding permitting any party to submit a reply to the Petition, as a matter of right, and permitting MMRR to file rebuttal to those replies as a matter of right. In MMRR1, the Board relied upon unverified comments filed by the Michigan Department of Transportation, to which MMRR had no right to respond.

MMRR contends that the Board’s rules at 49 C.F.R. §§ 1152.60 (the “Abandonment Exemption Rules”), 1121 (the “Exemption Rules”), and 1112 (the “Modified Procedure Rules”) as well as 49 U.S.C. § 10502 permit the opening of the type of proceeding proposed by MMRR.

MMRR is requesting the Board to commence a proceeding and establish a procedural schedule so that any party seeking to comment on the proposed abandonment has a right to comment and submit evidence, and so that MMRR has an opportunity to respond. MMRR believes that the proposed abandonment may generate comments.

Company—Discontinuance of Service Exemption—In Los Angeles County, CA, ICC Docket No. AB-12 (Sub-No. 172X) (ICC served December 23, 1994).

¹² *CSX Transportation, Inc –Abandonment Exemption—in Genesee County, MI*, STB Docket No. AB-55 (Sub-No. 633X) (STB served July 25, 2007).

MRR has been advised that the Frigidaire facility has been sold to a party that may be interested in rail service. However, MMRR has not been contacted concerning providing rail service, nor has MMRR been advised of the commodity to be shipped and the number of carloads that might be shipped or when rail service would begin. Speculation about future traffic does not relieve MMRR of the burden of continued ownership of the Line. However, MMRR should be permitted to respond to whatever, if any, comments are submitted. The Board can avoid additional petitions for leave to respond by opening a proceeding.

Under 49 U.S.C. § 10502(b), the “Board may, where appropriate, begin a proceeding under this section on its own initiative or on application by ... an interested party.” MMRR contends that it is appropriate to begin a proceeding in this matter

The Board has adopted special rules applicable to petitions for exemption involving the abandonment of a rail line 49 C.F.R. §1152.60. Procedurally, those rules require that within 20 days of the filing of the petition, the Board, through the Director of the Office of Proceedings, will publish a notice of the filing in the *Federal Register*. 49 C.F.R. §1152.60(a). Where the Abandonment Exemption Rules are not in conflict with the Exemption Rules, the Exemption Rules apply. *Id.* Under the Exemption Rules “the Board may consider during its deliberation any public comments filed in response to a petition for exemption.” 49 C.F.R. §1121.4(a). The Exemption Rules also permit the Board to “[d]irect that additional information be filed.” 49 C.F.R. §1121.4(c)(1)(i). The Modified Procedure Rules permit the Board to develop a record in writing (49 C.F.R. § 1112.1) and set out a schedule (49 C.F.R. § 1112.2).¹³

MMRR is requesting the Board to give effect to all of these rules and adopt a schedule similar to that used in abandonment application proceedings. *See* 49 C.F.R. § 1152.26(a).

MMRR proposes that the Board adopt and publish in the notice in the *Federal Register*, the following schedule:

February 20, 2008—Petition for Exemption filed.

March 11, 2008—Due date for Notice of Petition to be published in the *Federal Register*.

April 4, 2008—Due date for protests and comments, including opposition case in chief, and for public use and trail use requests.

April 18, 2008—Due date for MMRR's reply to opposition case and for MMRR's response to trail use requests.

June 6, 2008—Due date for service of decision on the merits.

June 16, 2008—Due date for offers of financial assistance, unless exempted by the Board.

MMRR's request is consistent with the Board's recent practice. The Board instituted a proceeding upon the request of the petitioner, established a procedural schedule permitting interested parties to submit comments, and permitted the petitioner to respond as a matter of right. MMRR seeks the same relief here.¹⁴

MMRR has presented its case-in-chief in this Petition. MMRR respectfully requests the Board to notify potential parties in the *Federal Register* notice that a procedural schedule is being adopted similar to the one used for abandonment applications.

COMBINED ENVIRONMENTAL AND HISTORIC REPORT

A Combined Environmental and Historic Report is in Exhibit B.

FEDERAL REGISTER NOTICE

A draft Federal Register notice is attached hereto as Exhibit C.

¹³ See, e.g. *Chicago, R I & P R Co. Abandonment*, 363 I.C.C. 150 (1980).

LABOR PROTECTION

The interests of railroad employees of MMRR who may be adversely affected by the proposed abandonment will be adequately protected by the labor protective conditions in *Oregon Short Line R Co --Abandonment--Goshen*. 360 I.C.C. 91 (1979).

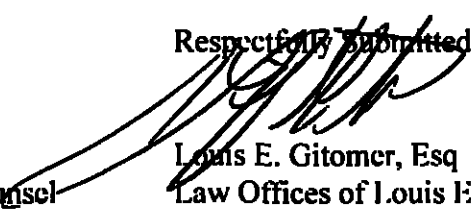
CONCLUSION

Application of the regulatory requirements and procedures of 49 U.S.C. §§ 10903 and 10904 to the abandonment of the Line proposed by MMRR is not required to carry out the rail transportation policy set forth in 49 U.S.C. § 10101, as previously shown. Nor is Board regulation required to protect shippers from the abuse of market power. Moreover, this abandonment is of limited scope. Adoption of a procedural schedule is warranted in this proceeding

Accordingly, MMRR respectfully urges the Board to grant an exemption for the proposed abandonment of the Line and from the OIA Provisions, and establish the proposed procedural schedule.

Respectfully Submitted,

Scott G. Williams, Esq.
Senior Vice President and General Counsel
RailAmerica, Inc.
5300 Broken Sound Boulevard N.W.
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Boca Raton, FL 33487
(561) 226-1757

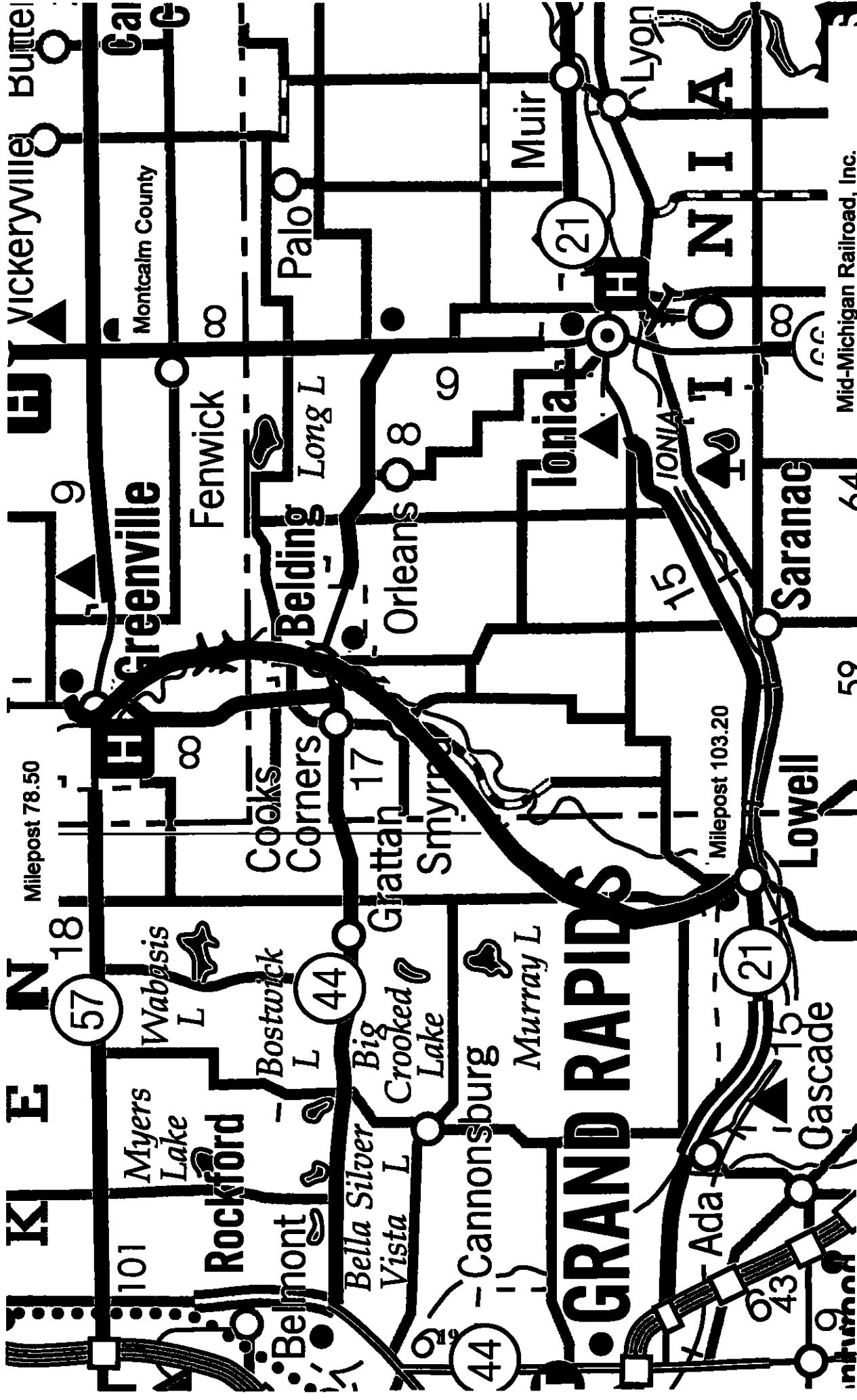

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Attorneys for: MID-MICHIGAN
RAILROAD, INC.

Dated: February 20, 2008

¹⁴ *Michigan Central Railway, LLC--Acquisition and Operation Exemption--Lines of Norfolk Southern Railway Company*, STB Finance Docket No. 35063 (STB served August 2, 2007).

EXHIBIT A-MAP



Mid-Michigan Railroad, Inc.
AB-364 (Sub-No. 14X)
Abandonment Exemption
Kent, Ionia, and Montcalm Counties, MI

EXHIBIT B—COMBINED ENVIRONMENTAL AND HISTORIC REPORT

CERTIFICATE OF SERVICE OF COMBINED ENVIRONMENTAL AND HISTORIC REPORT

Pursuant to the requirements of 49 C.F.R. §1105.7(c) and .8(c), the undersigned hereby certifies that a copy of the Combined Environmental and Historic Report in Docket No. AB-364 (Sub-No. 14X) was mailed via first class mail on January 29, 2008, to the following parties:

Michigan Department of Environmental Quality
Director, Mr. Steven Chester
Constitution Hall Floor Number 6
525 West Allegan Street
P.O. Box 30473
Lansing, MI 48909-7973

Honorable Daryl J. Delabbio
County Administrator
Kent County
County Administration Building
300 Monroe Avenue, NW
Grand Rapids, MI 49503-2206

Michigan Historic Center
702 West Kalamazoo Street
P.O. Box 30740
Lansing, MI 48909-8240

Michigan Department of Environmental Quality
P.O. Box 30473-7973
Lansing, MI 48909

Detroit District Headquarters
U S Army Corps of Engineers
Detroit District
477 Michigan Ave
Detroit, MI 48226

USDA Natural Resources Conservation Service
3001 Coolidge Street
East Lansing, MI 48823-6350

**U.S. Environmental Protection Agency
Region 5
Metcalf Building
Office of Strategic Environmental Analysis
77 West Jackson Boulevard
Mailcode: B-19J
Chicago, IL 60604**

**U.S. Fish and Wildlife Service
Region 3
One Federal Drive
BHW Federal Building
Fort Snelling
Twin Cities, MN 55111**

**National Oceanic and Atmospheric Administration
National Geodetic Survey
1315 East-West Highway
Silver Spring, MD 20910-3282**

**U.S. National Park Service
Midwest Region
1709 Jackson Street
Omaha, NE 68102**

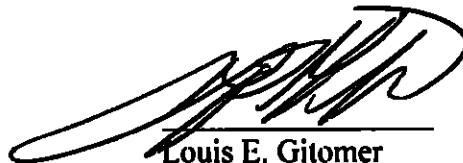
**Mayor Jeanne Shores
301 East Main Street
Lowell, MI 49331**

**Dr. Kenneth E. Snow
Mayor, City of Greenville
411 South Lafayette
Greenville, MI 48838**

**Honorable Chris Hyzer
Administrator/Controller
Montcalm County
P.O. Box 368
Stanton, Michigan, 48888-0368**

Mayor Shane T. Husted
120 S Pleasant St.
Belding, MI 48809

Mr. James Banks
Chairman
Ionia County Board of Commissioners
602 Sixth Avenue
Lake Odessa, MI 48849

A handwritten signature in black ink, appearing to read 'L. Gitomer', written over a horizontal line.

Louis E. Gitomer
February 20, 2008

COMBINED ENVIRONMENTAL AND HISTORIC REPORT
(49 C.F.R. 1105.7 and 1105.8)

Docket No. AB-364 (Sub-No. 14X)

**MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT, IONIA, AND MONTCALM COUNTIES, MI**

Dated: January 29, 2008

ENVIRONMENTAL REPORT

(1) Proposed Action and Alternatives. Describe the proposed action, including commodities transported, the planned disposition (if any) of any rail line and other structures that may be involved, and any possible changes in current operations or maintenance practices. Also describe any reasonable alternatives to the proposed action. Include a readable, detailed map and drawings clearly delineating the project.

Mid-Michigan Railroad, Inc. (“MMRR”) proposes to abandon the 24.7-mile rail line between Lowell, milepost 103.2, and Greenville, milepost 78.5, the end of the line, in Kent, Ionia, and Montcalm Counties, MI (the “Line”). Upon receipt of abandonment authority from the Surface Transportation Board (the “Board”), MMRR proposes to convert the Line to interim trail use/rail banking under 16 U.S.C. § 1247(d) through the sale of the Line to West Michigan Trails and Greenways Coalition (“WMTGC”). MMRR will salvage the track and materials from the Line, but will leave the ballast, ties, bridges and culverts in place for the use of the trail.

Abandonment of the Line will result in the removal of the rail. MMRR does not intend to disturb any sub grade or sub grade structures and does not intend to remove any bridge structures. The operations and maintenance of the line will cease. Removal of the Line will result in the elimination of 39 public road crossings and 42 private crossings.

In 2006 there were two shippers using the Line, Frigidaire Corporation (“Frigidaire”) and Crop Production Services (“CPS”). Both were located in Greenville, MI, the end of the Line. Frigidaire closed its facility in Greenville, moved to Mexico and South Carolina and stopped

shipping in March 2006. CPS shipped one carload of fertilizer in December 2006. There have been no shipments over the Line in 2007 or 2008.

There are two alternatives to a full abandonment. One alternative would be for MMRR not to abandon the Line. No service has been provided on the Line since December 2006. The Line is a stub end track and therefore has no overhead traffic. With little, if any, potential traffic, MMRR has decided to seek abandonment of the Line. The other more likely alternative will be for MMRR to convert the Line to interim trail use/rail banking through the sale to WMTGC. MMRR has entered a Memorandum of Understanding with WMTGC. It would be MMRR's preference to obtain authority to abandon the Line and convert it to interim trail use/rail banking through the sale to WMTGC.

MMRR previously served on the required parties on October 22, 2007, and filed with the Board on November 27, 2007, a Combined Environmental and Historic Report (the "CEHR") for the Line in *Mid-Michigan Railroad, Inc.—Abandonment Exemption—in Kent and Montcalm Counties, MI*, STB Docket No. AB-364 (Sub-No 11X). The Board rejected the Petition for Exemption on procedural grounds without prejudice to refiling in a decision served on January 25, 2008. By this CEHR, MMRR is re-commencing the abandonment process for the Line.

Color copies of Exhibit 3-USGS Maps and Exhibit 4-Bridges and Structures in the Historic Report ("HR") are being served only on the Michigan Historic Center, since they are only required in the HR. Black and white copies of these documents are being served in the other copies of this CEHR, but MMRR will provide color copies of Exhibits 3 and 4 upon request.

A map of the proposed abandonment is attached hereto as Exhibit 1.¹

(2) Transportation System. Describe the effects of the proposed action on regional or local transportation systems and patterns. Estimate the amount of traffic (passenger or freight) that will be diverted to other transportation systems or modes as a result of the proposed action.

No passenger traffic will be diverted to other modes as a result of the proposed abandonment. CPS, the only shipper on the line, has not used the Line since December 2006, when it received one carload. No traffic moved over the Line in 2007 or to date in 2008. Hence, at most the freight traffic from one rail car per year will be diverted to motor carrier. Accordingly, the proposed abandonment should have no adverse effects on regional or local transportation systems and patterns.

(3) Land Use. (i) Based on consultation with local and/or regional planning agencies and/or a review of the official planning documents prepared by such agencies, state whether the proposed action is consistent with existing land use plans. Describe any inconsistencies. (ii) Based on consultation with the U.S. Soil Conservation Service, state the effect of the proposed action on any prime agricultural land. (iii) If the action affects land or water uses within a designated coastal zone, include the coastal zone information required by 1105.9. (iv) If the proposed action is an abandonment, state whether or not the right-of-way is suitable for alternative public use under 49 U.S.C. § 10905 and explain why.

(i) MMRR considers the proposed abandonment to be consistent with existing land use plans. Other than in Lowell and Greenville, the land adjoining the Line is mainly rural in character.

MMRR contacted Kent, Ionia, and Montcalm Counties, MI and the cities of Lowell, Belding and Greenville, MI by letters dated January 29, 2008. See Exhibit 2. No response has been received as of this date. A copy of this Environmental Report has been mailed to the appropriate local and state agencies for their information and further comment.

¹ The copy of the map that accompanied the information-gathering letter has been removed from that letter. That map was the same as the map in Exhibit 1 accompanying this report.

(ii) MMRR does not believe that there is any prime agricultural land that will be affected. MMRR notified the United States Department of Agriculture ("USDA") Natural Resources Conservation Service (the agency succeeding to the responsibilities of the Soil Conservation Service) of the proposed abandonment by letter dated January 29, 2008, and requested assistance in identifying any potential effects on prime agricultural land. See Exhibit 2. A response to the prior CEHR stating that "[a]bandonment of the rail line will not result in the conversion of prime and unique farmland" is attached in Exhibit 5.

(iii) The Line does not pass through a designated coastal zone.

(iv) Based on discussions with WMTGC, MMRR believes that the Line is suitable for interim trail use/ rail banking.

(4) Energy. (i) Describe the effect of the proposed action on transportation of energy resources. (ii) Describe the effect of the proposed action on recyclable commodities. (iii) State whether the proposed action will result in an increase or decrease in overall energy efficiency and explain why. (iv) If the proposed action will cause diversions from rail to motor carriage of more than: (A) 1,000 rail carloads a year; or (B) an average of 50 rail carloads per mile per year for any part of the affected line, quantify the resulting net change in energy consumption and show the data and methodology used to arrive at the figure given.

(i) The proposed abandonment will have no effect on the transportation of energy resources.

(ii) The proposed abandonment will have no effect on the transportation of recyclable commodities.

(iii) The proposed abandonment will have minimal effect on overall energy efficiency since there has been no traffic on the Line since December 2006

(iv) The proposed abandonment will not cause the diversion more than 1,000 rail carloads a year; or an average of 50 rail carloads per mile per year for any part of the Line of rail traffic to motor carriage.

(5) **Air.** (i) If the proposed action will result in either: (A) An increase in rail traffic of at least 100 percent (measured in gross ton miles annually) or an increase of at least eight trains a day on any segment of rail line affected by the proposal, or (B) an increase in rail yard activity of at least 100 percent (measured by carload activity), or (C) an average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on any affected road segment, quantify the anticipated effect on air emissions. For a proposal under 49 U.S.C. § 10901 (or § 10505) to construct a new line or reinstitute service over a previously abandoned line, only the eight train a day provision in sub-section (5)(i)(A) will apply. (ii) If the proposed action affects a class I or nonattainment area under the Clean Air Act, and will result in either: (A) an increase in rail traffic of at least 50 percent (measured in gross ton miles annually) or an increase of at least three trains a day on any segment of rail line; (B) an increase in rail yard activity of at least 20 percent (measured by carload activity); or (C) an average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day on a given road segment, then state whether any expected increased emissions are within the parameters established by the State Implementation Plan. However, for a rail construction under 49 U.S.C. § 10901 (or 49 U.S.C. § 10505), or a case involving the reinstitution of service over a previously abandoned line, only the three train a day threshold in this item shall apply. (iii) If transportation of ozone depleting materials (such as nitrogen oxide and freon) is contemplated, identify: the materials and quantity; the frequency of service; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and spills; contingency plans to deal with accidental spills; and the likelihood of an accidental release of ozone depleting materials in the event of a collision or derailment.

(i) The proposed abandonment will not result in meeting or exceeding the specified thresholds.

(ii) The proposed abandonment will not result in meeting or exceeding the specified thresholds.

(iii) The proposed abandonment will not affect the transportation of ozone depleting materials.

(6) **Noise.** If any of the thresholds identified in item (5)(i) of this section are surpassed, state whether the proposed action will cause: (i) an incremental increase in noise levels of three decibels Ldn or more; or (ii) an increase to a noise level of 65 decibels Ldn or greater. If so, identify sensitive receptors (e.g., schools, libraries, hospitals, residences, retirement communities, and nursing homes) in the project area, and quantify the noise increase for these receptors if the thresholds are surpassed.

Not applicable.

(7) **Safety.** (i) Describe any effects of the proposed action on public health and safety (including vehicle delay time at railroad grade crossings). (ii) If hazardous materials are

expected to be transported, identify: the materials and quantity; the frequency of service; whether chemicals are being transported that, if mixed, could react to form more hazardous compounds; safety practices (including any speed restrictions); the applicant's safety record (to the extent available) on derailments, accidents and hazardous spills; the contingency plans to deal with accidental spills; and the likelihood of an accidental release of hazardous materials. (iii) If there are any known hazardous waste sites or sites where there have been known hazardous materials spills on the right-of-way, identify the location of those sites and the types of hazardous materials involved.

(i) The proposed abandonment will have no detrimental effects on public health and safety. MMRR will cease operating over the Line. As a result of the abandonment, MMRR will remove 39 public road crossings and 42 private crossings.

(ii) The proposed abandonment will not affect the transportation of hazardous materials.

(iii) There was a spill of liquid nitrogen fertilizer, a non-hazardous material, at a siding at milepost 95.9 in December 2001. There was a loss of about 13,000 to 14,000 gallons. As a result of the spill, under the direction of the Michigan Department of Agriculture ("MDAG"), about eight barrels were loaded with the spilled liquid nitrogen fertilizer that had pooled on the ground, and about 10 to 12 inches of soil were removed down to the clay along 360 feet, resulting in the removal of about 65 to 70 cubic yards of soil. The soil was secured at another location to be used as fertilizer in the spring and the drums of the liquid nitrogen fertilizer were moved to the shipper's storage facility. MDAG approved back filling the excavation with sand, which was done. The spill had apparently occurred on December 2, 2001 and MMRR was notified on December 3, 2001. The removal of the soil and clean-up of the spill was completed on December 4, 2001.

MMRR is not aware of any known hazardous waste sites or sites where there have been known hazardous materials spills on the Line.

(8) Biological Resources. (i) Based on consultation with the U.S. Fish and Wildlife Service, state whether the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat, and if so, describe the effects. (ii) State whether

wildlife sanctuaries or refuges, National or State parks or forests will be affected, and describe any effects.

(i) MMRR does not believe that the proposed action is likely to adversely affect endangered or threatened species or areas designated as a critical habitat. MMRR notified the U.S. Fish and Wildlife Service ("USF&W") of the proposed abandonment by letter dated January 29, 2008, and requested assistance in determining whether the proposed abandonment will adversely affect endangered or threatened species or areas designated as a critical habitat. *See Exhibit 2.* A copy of this Report was supplied to the USF&W for its information and further comment. By letter dated October 26, 2007, in response to the prior CEHR, USF&W indicated that it "does not have any concerns regarding real estate matters in the abandonments." A copy of the letter is in Exhibit 5.

(ii) Between Belding and Greenville, the Line passes through the Flat River State Game Area. MMRR does not expect the abandonment to affect the Flat River State Game Area since MMRR is planning to cease operations, only remove track and materials, and convert the Line to interim trail use/rail banking.

MMRR is unaware of any other wildlife sanctuaries or refuges, National or State parks or forests that would be adversely affected by the proposed abandonment.

MMRR notified the National Parks Service of the proposed abandonment by letter dated January 29, 2008, and requested assistance in identifying any potential effects on wildlife sanctuaries or refuges, National or State parks or forests. *See Exhibit 2.* To date, no response to this request has been received. A copy of this Report is being supplied to the National Park Service for its information and comment.

(9) Water. (i) Based on consultation with State water quality officials, state whether the proposed action is consistent with applicable Federal, State or local water quality standards. Describe any inconsistencies. (ii) Based on consultation with the U.S. Army Corps of Engineers,

state whether permits under section 404 of the Clean Water Act (33 U.S.C. § 1344) are required for the proposed action and whether any designated wetlands or 100-year flood plains will be affected. Describe the effects. (iii) State whether permits under section 402 of the Clean Water Act (33 U.S.C. § 1342) are required for the proposed action.

(i) MMRR is confident that the proposed abandonment will be consistent with applicable water quality standards. MMRR contacted the Michigan Department of Environmental Quality (“MIDEQ”) and the United States Environmental Protection Agency (“USEPA”) by letters dated January 29, 2008. *See Exhibit 2.* To date, no response to this request has been received. A copy of this Report has been supplied to the MIDEQ and USEPA for their information and comment.

(ii) MMRR believes that no permits under section 404 of the Clean Water Act are required for the proposed abandonment and that no designated wetlands or 100-year flood plains will be affected by the proposed abandonment. MMRR does not plan to salvage any of the crossties, ballast, or bridges on the Line so that they can be used when the Line is converted to interim trail use/rail banking. Upon receiving abandonment authority, removal of material will be accomplished by use of the right-of-way for access, along with existing public and private crossings. No new access roads are contemplated. MMRR does not intend to disturb any of the underlying roadbed or perform any activities that would cause sedimentation or erosion of the soil, and does not anticipate any dredging or use of fill in the removal of the track material. Debris will be transported away from the Line and will not be discarded along the right-of-way nor be placed or left in streams or wetlands, or along the banks of such waterways. Also, during track removal, appropriate measures will be implemented to prevent or control spills from fuels, lubricants or any other pollutant materials from entering any waterways. Based upon this course of action, MMRR does not believe a permit under Section 404 of the Clean Water Act will be required.

MMRR contacted the U.S. Army Corps of Engineers by letter dated January 29, 2008 and has received no response to date. *See* Exhibit 2. A copy of this Report has been supplied to the U.S. Army Corps of Engineers for its information and comment.

(iii) MMRR believes that no permit under section 402 of the Clean Water Act would be required for the abandonment. MMRR does not plan to salvage any of the ties, ballast, or bridges on the Line so that they can be used when the Line is converted to interim trail use/rail banking. MMRR contacted the MIDEQ and the USEPA by letter dated January 29, 2008. *See* Exhibit 2. A copy of this Report has been supplied to the MIDEQ and USEPA for their information and further comment.

(10) Proposed Mitigation. Describe any actions that are proposed to mitigate adverse environmental impacts, indicating why the proposed mitigation is appropriate.

MMRR does not expect any adverse environmental impact from the proposed abandonment and, therefore, see no need for any mitigating actions. MMRR will, of course, adhere to any remedial actions suggested by the recipients of this Report, which are required by the Board.

HISTORIC REPORT

1. A U.S.G.S. topographic map (or alternate map drawn to scale and sufficiently detailed to show buildings and other structures in the vicinity of the proposed action) showing the location of the proposed action, and the locations and approximate dimensions of railroad structures that are 50 years old or older and are part of the proposed action;

U.S. Geological Survey Maps have been supplied to the Michigan Historic Center ("MIHC"). *See* Exhibit 3.

2. A written description of the right of way (including approximate widths, to the extent known), and the topography and urban and/or rural characteristics of the surrounding area;

The 24.7-mile right-of-way is generally 100 feet wide, with some variance in towns and villages.

The Line begins in northwest Lowell at milepost 103.2 at an elevation of about 650 feet, just south of Foreman Street. The Line travels in a northerly direction, west of the Flat River. After crossing 3 Mile Road NE, the Line turns in a northeasterly direction until it reaches 5 Mile Road NE where it runs parallel to that road for about 4,000 feet. The Line then turns northeast and passes to the southeast of Smyrna before it crosses Seely Creek just before the confluence with the Flat River.

The Line continues northeast, generally parallel to the Flat River until it crosses Michigan Highway 44 before crossing the Flat River and entering the town of Belding. The Line passes along the west and north of Belding before crossing the Flat River east of Michigan Highway 91. *Passing through the portion of Belding north of the Flat River, the Line turns northeasterly and crosses the Flat River again before turning in a northerly direction near Long Lake Road.*

The Line then travels in a north northwesterly direction to the east of the Flat River. The Line passes through the Flat River State Game Area and then enters the eastern section of Greenville. In a northerly direction, the Line crosses the Flat River two more times before turning northeasterly to the east of the Flat River. The Line then crosses Michigan Route 91 before terminating north of Churchill Lake at milepost 78.5.

3. Good quality photographs (actual photographic prints, not photocopies) of railroad structures on the property that are 50 years old or older and of the immediately surrounding area;

Photographs of the bridges on the Line and a detailed description of the bridges are attached as Exhibit 4. MMRR has entered a Memorandum of Understanding with WMTGC to convert the Line into interim trail use/rail banking. MMRR has agreed to leave the ties, ballast, and bridges intact for trail use. Therefore, MMRR will not be removing any of the bridges on the line. MMRR will only remove the track and materials (but not the ties) from the bridges, but will leave the bridges in place for trail use.

4. The date(s) of construction of the structure(s), and the date(s) and extent of any major alterations, to the extent such information is known;

See Exhibit 4.

5. A brief narrative history of carrier operations in the area, and an explanation of what, if any, changes are contemplated as a result of the proposed action;

MMRR has operated over the Line between Lowell and Greenville since 1987 when it acquired the Line from CSX Transportation, Inc. The last shipper on the Line is located in Greenville. CPS was last served in December 2006. The proposed abandonment will not result in a change of operations since there has been no demand for rail service.

The Belding to Greenville portion of the Line was opened 1871 by the Detroit, Lansing & Lake Michigan Railroad Company (1871-1872). The Belding to Lowell segment was opened by Grand Rapids, Belding and Saginaw Railroad Company (1898-1903) 1899. Both eventually amalgamated into Pere Marquette Railroad Company ("Pere Marquette") in 1900. Pere Marquette was sold to the C&O Railway Company ("C&O") in 1947. As part of the Chessie System, the C&O was merged into CSX Transportation, Inc.

CSXT sold the Line to MMRR in 1987. At that time, MMRR was a subsidiary of RailTex, Inc. RailTex merged into RailAmerica, Inc. in 2000.

6. A brief summary of documents in the carrier's possession, such as engineering drawings, that might be useful in documenting a structure that is found to be historic;

MMRR possesses the valuation maps of the Line, but is not aware of any other documentation in its possession.

7. An opinion (based on readily available information in the railroad's possession) as to whether the site and/or structures meet the criteria for listing on the National Register of Historic Places (36 C.F.R. 60.4), and whether there is a likelihood of archeological resources or any other previously unknown historic properties in the project area, and the basis for these opinions (including any consultations with the State Historic Preservation Office, local historical societies or universities);

MMRR believes that the bridges and structures on the Line are not unusual or noteworthy

for inclusion on the National Register of Historic Places. It is also MMRR's opinion that there are no archeological resources or other railroad related historic properties in the project area. Moreover, since MMRR is agreeable to converting the Line to interim trail use/rail banking, MMRR does not plan to alter, remove or dispose of any of the bridges that are on the Line.

8. A description (based on readily available information in the railroad's possession) of any known prior subsurface ground disturbance or fill, environmental conditions (naturally occurring or manmade) that might affect the archeological recovery of resources (such as swampy conditions or the presence of toxic waste), and the surrounding terrain.

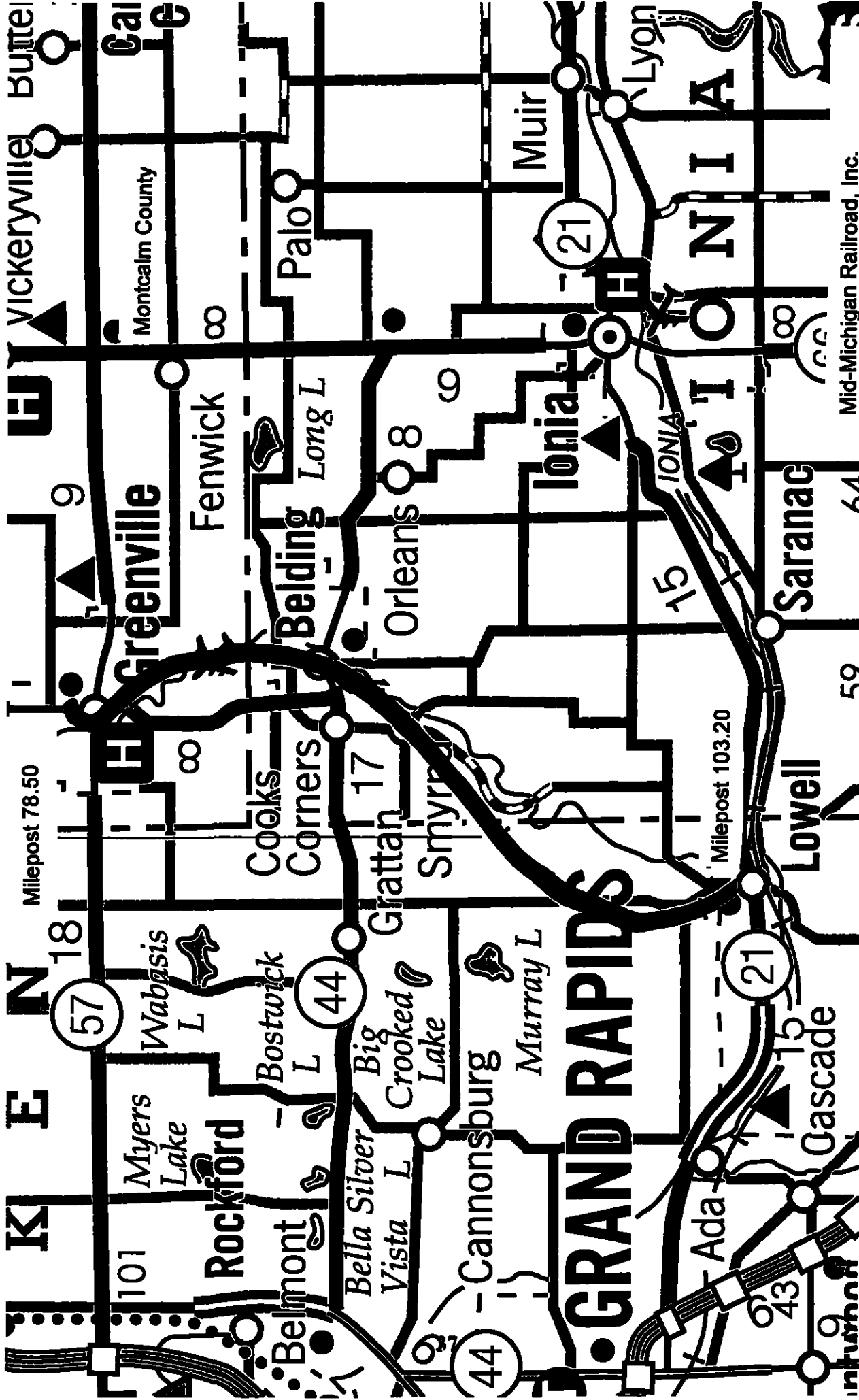
MMRR believes that there are no existing records as to the nature of any known subsurface ground disturbance or fill, or environmental conditions that might affect the archeological recovery of any potential resources.

9. Within 30 days of receipt of the historic report, the State Historic Preservation Officer may request the following additional information regarding specific non railroad owned properties or groups of properties immediately adjacent to the railroad right-of-way: photographs of specified properties that can be readily seen from the railroad right-of-way (or other public rights-of-way adjacent to the property) and a written description of any previously discovered archeological sites, identifying the location and type of the site (*i.e.* prehistoric or native American).

MMRR does not foresee the likelihood that any additional information will need to be supplied in association with the proposed abandonment other than that information previously submitted. But, if any additional information is requested, MMRR will promptly supply the necessary information.

MMRR contacted MIHC. *See* Exhibit 2. No response has been received. A copy of this Report has been mailed to MIHC.

EXHIBIT 1 – MAP



Mid-Michigan Railroad, Inc.
AB-364 (Sub-No. 14X)
Abandonment Exemption
Kent, Ionia, and Montcalm Counties, MI

EXHIBIT 2 – LETTERS

**LAW OFFICES OF
LOUIS E. GITOMER**

LOUIS E. GITOMER
LOU_GITOMER@VERIZON.NET

January 29, 2008

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

National Oceanic and Atmospheric Administration
National Geodetic Survey
1315 East-West Highway
Silver Spring, MD 20910-3282

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

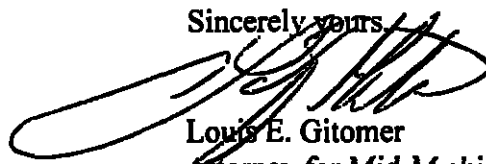
Dear Madam/Sir:

On or about February 19, 2008, we expect to be filing with the Surface Transportation Board ("STB") a petition for exemption seeking authority for Mid-Michigan Railroad, Inc. ("MMRR") to abandon a 24.7-mile rail line between milepost 103.20, at Lowell, and milepost 78.50, at Greenville, the end of the line proposed for abandonment, in Kent, Ionia, and Montcalm Counties, MI.

Attached is a Combined Environmental and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area. We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the STB's environmental review process, please contact the Section of Environmental Analysis (SEA), Surface Transportation Board, 395 E Street, SW, Washington, DC 20423, telephone 202-245-0295 and refer to the above Docket No. AB-364 (Sub-No. 14X).

Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks. Your comments will be considered by the STB in evaluating the environmental impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Louis E. Gitomer who may be contacted by telephone at 410-296-2250, email at Lou_Gitomer@verizon.net, or mail at Law Offices of Louis E. Gitomer, 600 Baltimore Avenue, Suite 301, Towson, MD 21204.

Sincerely yours,



Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

Enclosures

**LAW OFFICES OF
LOUIS E. GITOMER**

LOUIS E. GITOMER
LOU_GITOMER@VERIZON.NET

January 29, 2008

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
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U.S. Fish and Wildlife Service, Region 3
One Federal Drive
BHW Federal Building
Fort Snelling
Twin Cities, MN 55111

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc.—
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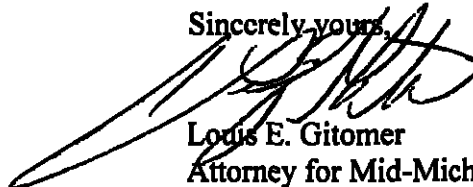
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Sincerely yours,



Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

Enclosures

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January 29, 2008

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Chicago, IL 60604

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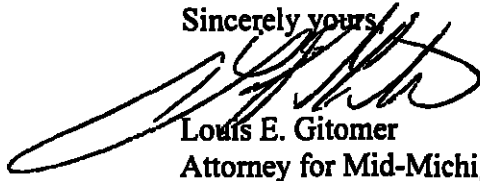
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Sincerely yours,



Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

Enclosures

**LAW OFFICES OF
LOUIS E. GITOMER**

LOUIS E. GITOMER
LOU_GITOMER@VERIZON.NET

January 29, 2008

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

USDA Natural Resources Conservation Service
3001 Coolidge Street
East Lansing, MI 48823-6350

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc.—
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

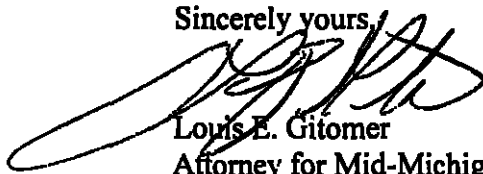
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Detroit District Headquarters
U.S. Army Corps of Engineers
Detroit District
477 Michigan Ave.
Detroit, MI 48226

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

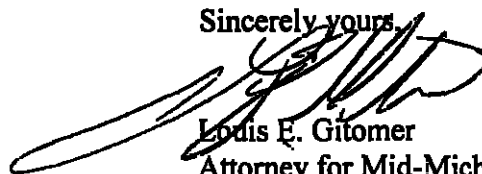
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January 29, 2008

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Manager, Federal Project Review
Michigan Department of Commerce
Michigan Neighborhood Builders Alliance
P.O. Box 30242
Lansing, MI 48909

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

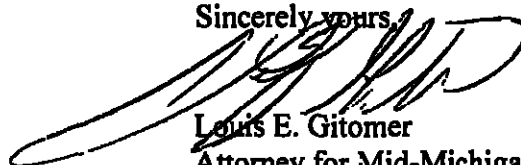
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Michigan Department of Environmental Quality
P.O. Box 30473-7973
Lansing, MI 48909

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc.—
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

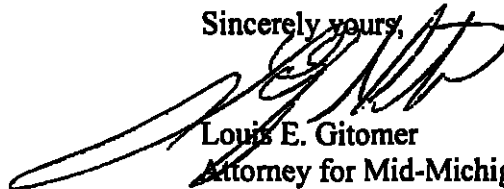
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Michigan Historic Center
702 West Kalamazoo Street
P.O. Box 30740
Lansing, MI 48909-8240

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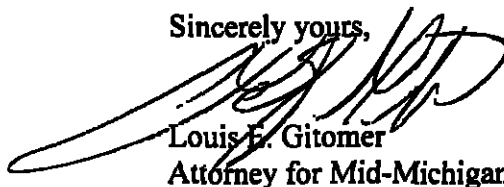
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U.S. National Park Service
Midwest Region
1709 Jackson Street
Omaha, NE 68102

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
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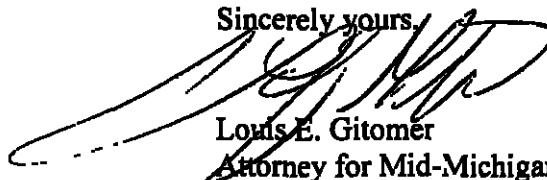
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January 29, 2008

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Honorable Chris Hyzer
Administrator/Controller
Montcalm County
P.O. Box 368
Stanton, Michigan, 48888-0368

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

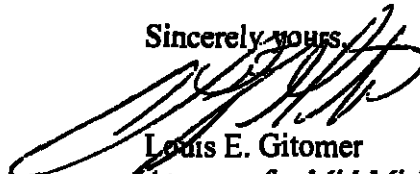
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January 29, 2008

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
FAX (410) 332-0885

Mayor Jeanne Shores
301 East Main Street
Lowell, MI 49331

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

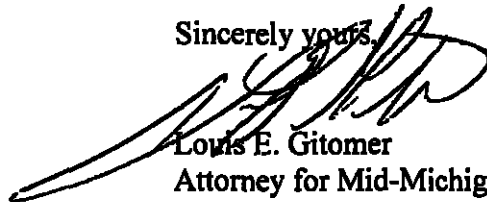
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January 29, 2008

THE ADAMS BUILDING, SUITE 301
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TOWSON, MARYLAND 21204-4022
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FAX (410) 332-0885

Dr. Kenneth E. Snow
Mayor, City of Greenville
411 South Lafayette
Greenville, MI 48838

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

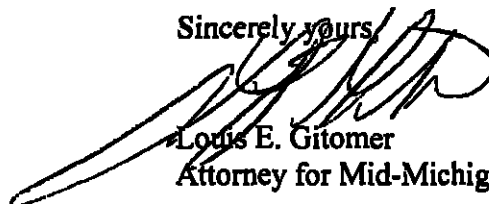
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January 29, 2008

THE ADAMS BUILDING, SUITE 301
600 BALTIMORE AVENUE
TOWSON, MARYLAND 21204-4022
(202) 466-6532
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Honorable James Banks, Chairman
Board of Commissioners
Ionia County
602 Sixth Avenue
Lake Odessa, MI 48849

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc.*—
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI

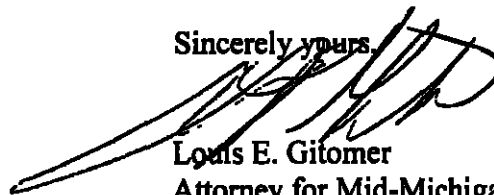
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Mayor Shane T. Husted
120 S. Pleasant St.
Belding, MI 48809

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc. –
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI*

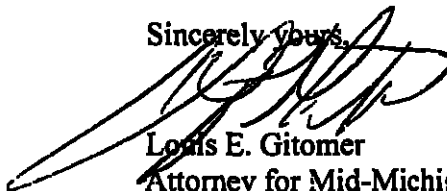
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County Administrator, Kent County
County Administration Building
300 Monroe Avenue, NW
Grand Rapids, MI 49503-2206

RE: Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad, Inc.*—
Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI

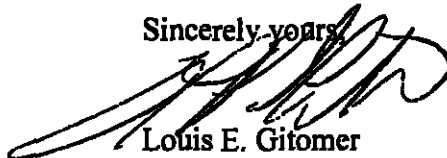
Dear Madam/Sir:

On or about February 19, 2008, we expect to be filing with the Surface Transportation Board ("STB") a petition for exemption seeking authority for Mid-Michigan Railroad, Inc. ("MMRR") to abandon a 24.7-mile rail line between milepost 103.20, at Lowell, and milepost 78.50, at Greenville, the end of the line proposed for abandonment, in Kent, Ionia, and Montcalm Counties, MI.

Attached is a Combined Environmental and Historic Report describing the proposed action and any expected environmental and historic effects, as well as a map of the affected area. We are providing this report so that you may review the information that will form the basis for the STB's independent environmental analysis of this proceeding. If any of the information is misleading or incorrect, if you believe that pertinent information is missing, or if you have any questions about the STB's environmental review process, please contact the Section of Environmental Analysis (SEA), Surface Transportation Board, 395 E Street, SW, Washington, DC 20423, telephone 202-245-0295 and refer to the above Docket No. AB-364 (Sub-No. 14X).

Because the applicable statutes and regulations impose stringent deadlines for processing this action, your written comments to SEA (with a copy to our representative) would be appreciated within 3 weeks. Your comments will be considered by the STB in evaluating the environmental impacts of the contemplated action. If there are any questions concerning this proposal, please contact our representative directly. Our representative in this matter is Louis E. Gitomer who may be contacted by telephone at 410-296-2250, email at Lou_Gitomer@verizon.net, or mail at Law Offices of Louis E. Gitomer, 600 Baltimore Avenue, Suite 301, Towson, MD 21204.

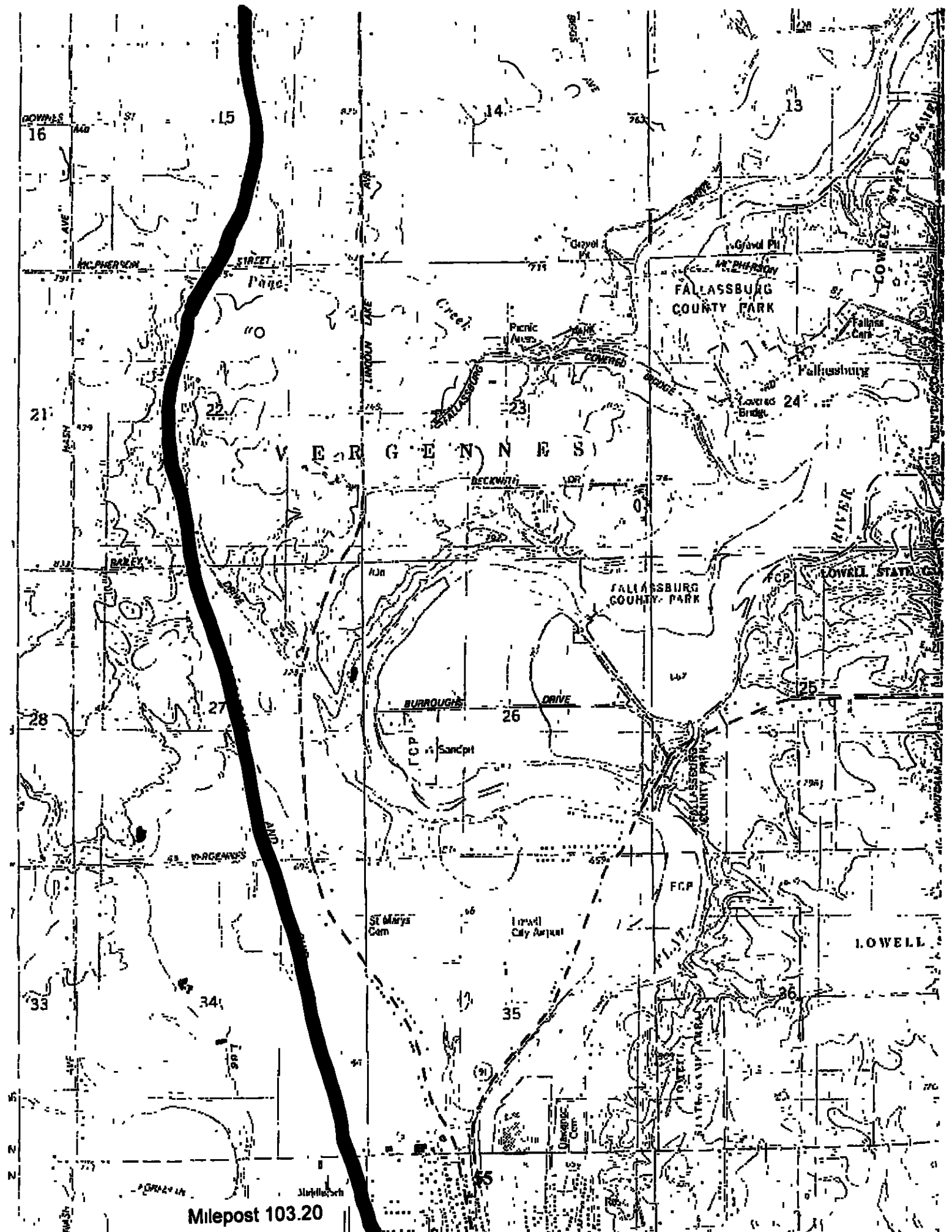
Sincerely yours,



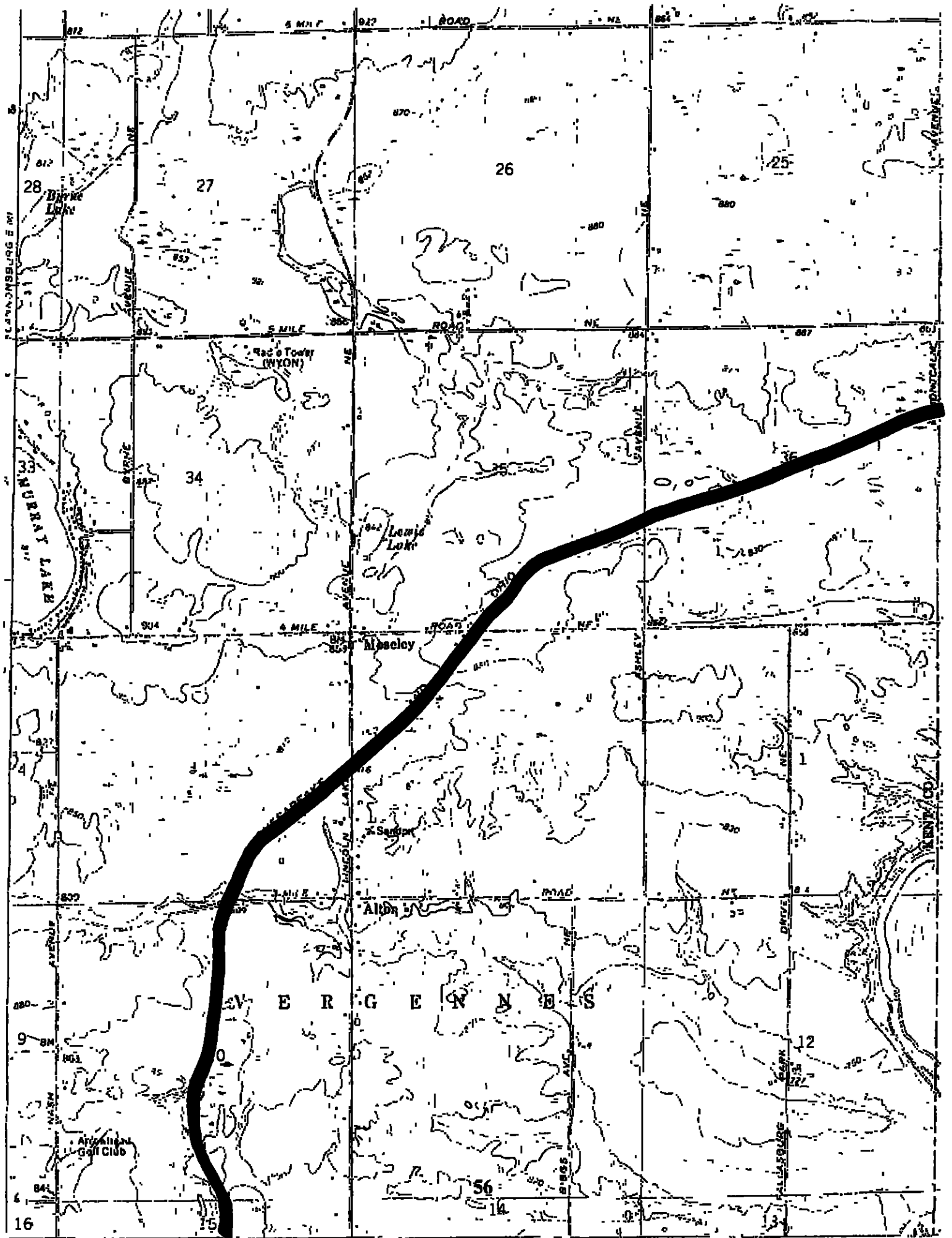
Louis E. Gitomer
Attorney for Mid-Michigan Railroad, Inc.

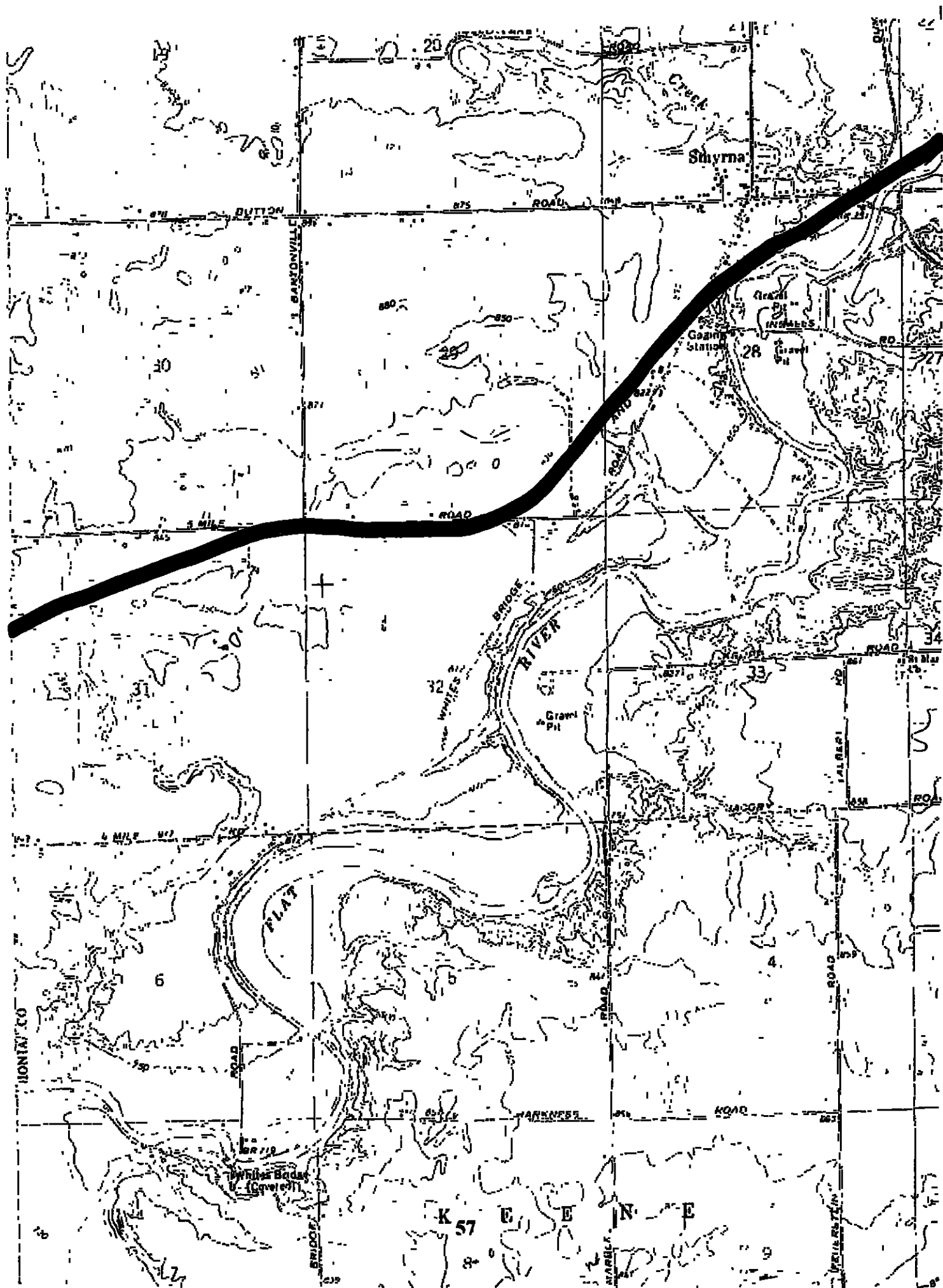
Enclosures

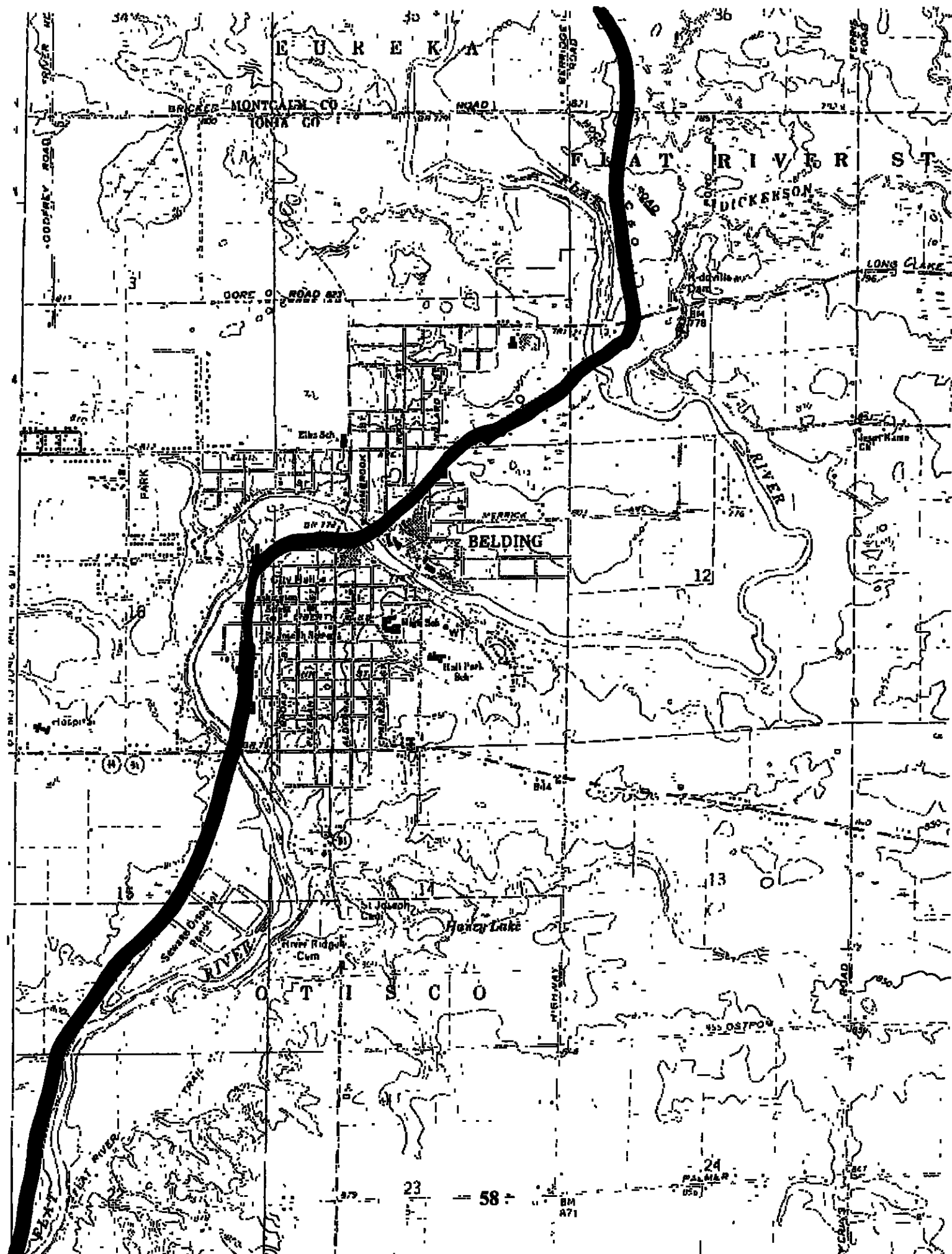
EXHIBIT 3 – USGS MAPS

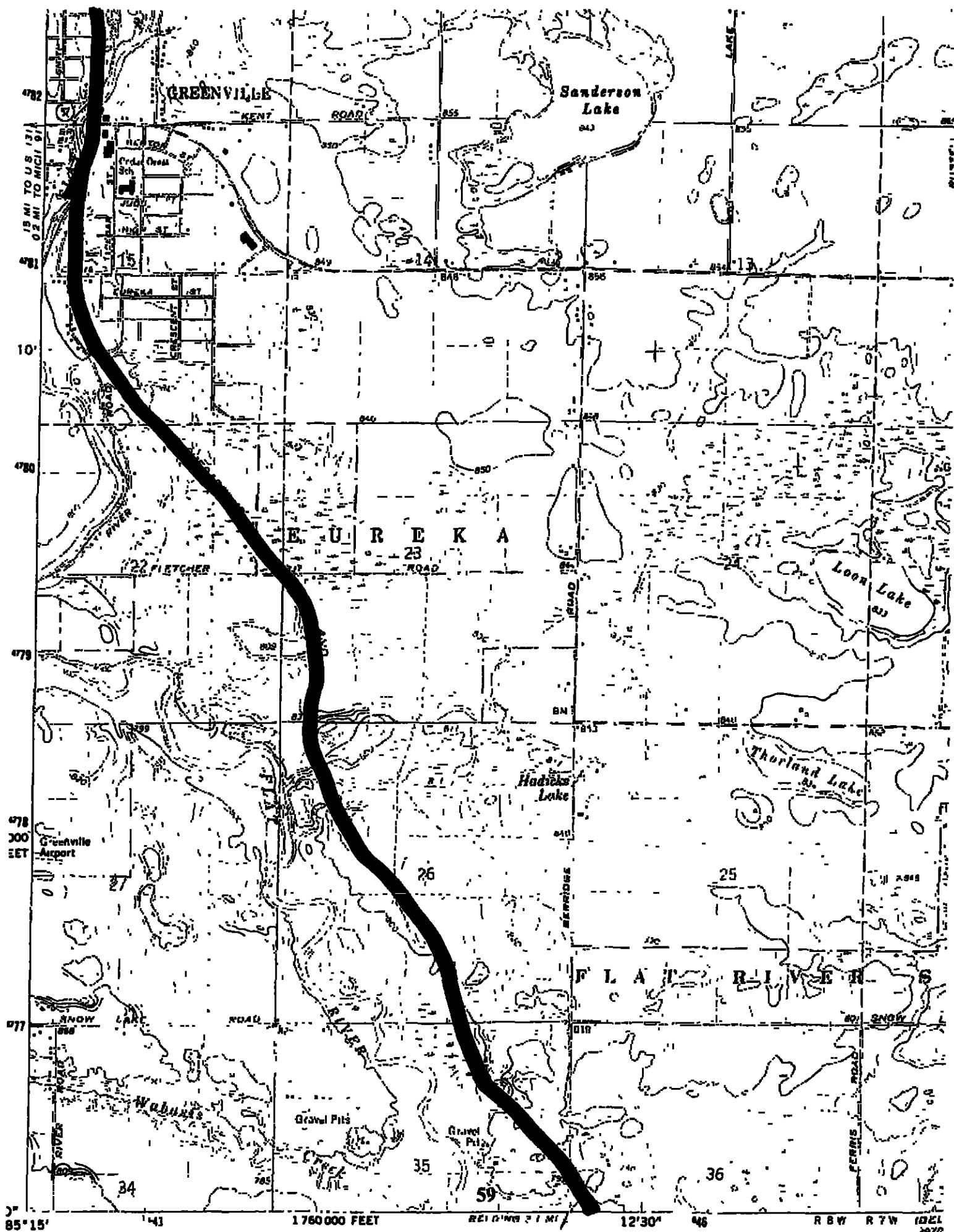


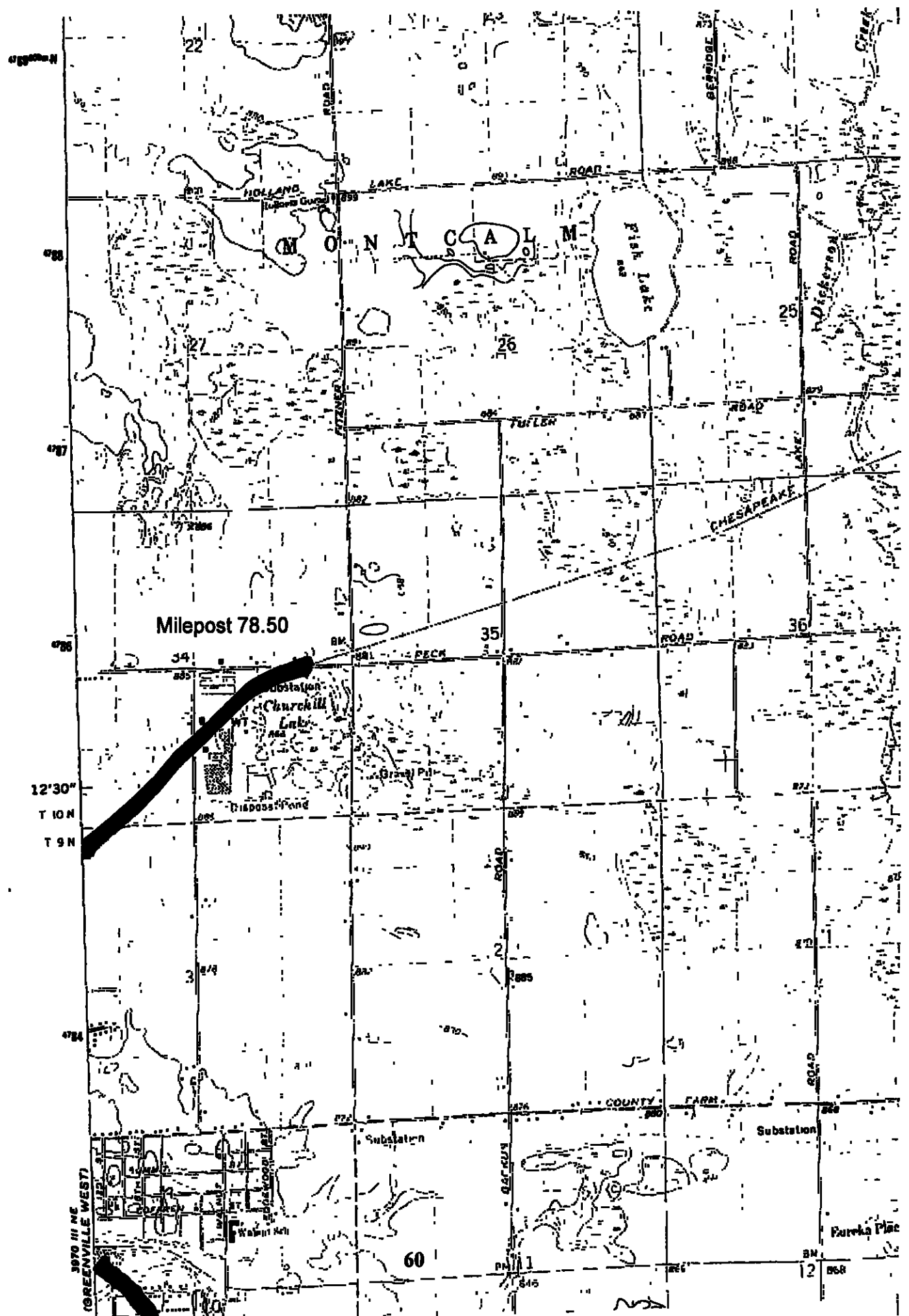
Milepost 103.20











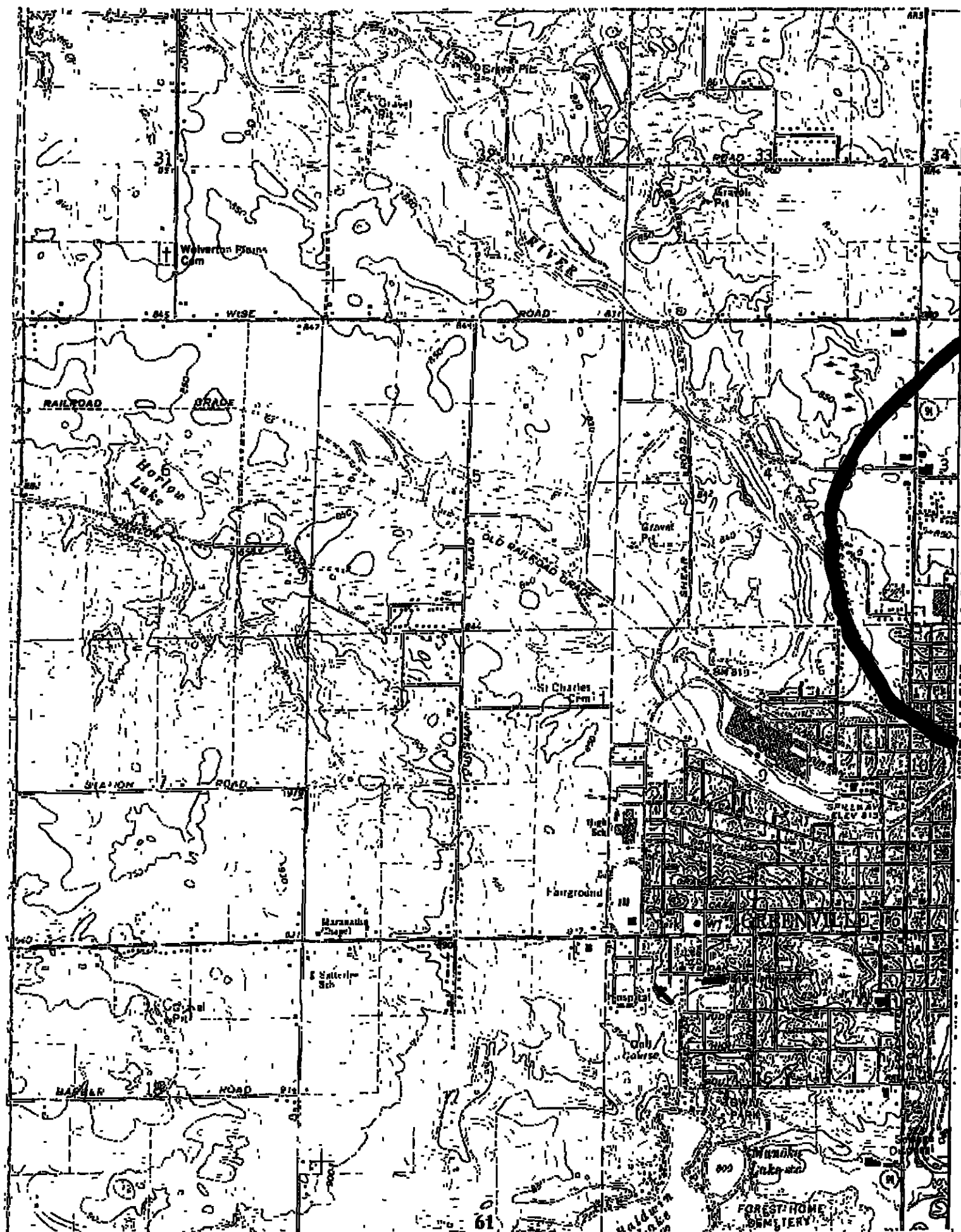


EXHIBIT 4 – BRIDGE PHOTOGRAPHS AND DESCRIPTIONS

Greenville 81.10

R		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Timber Trestle Structure						
Structure	PT	Deck Typ.	Ballast	Crossing	River	
# Spans	13	Length	175	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir.	R - L	
Year Built	1943	Alignment	C			Greenville 81.10 Flat River
General		G/F/P/B	Superstructure		G/F/P/B	Substructure G/F/P/B
Scour	Fair		Stringers	Poor	Bridge Seats/Caps	Bad
Channel/Road	Poor		Floor Beams		Abuts/Backwalls	Poor
Approach	Fair		Girders/Truss/Slab		Piers, Towers, Bents	Poor
Deck		G/F/P/B	Top Flange		Misc	G/F/P/B
Ties	Fair		Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track	Fair		Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearngs			
					Overall Rating:	Poor
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P11-P12	- Bent 11 cap crushing - urgent replacement still required					
P10	- Bent 8 - piles 2 and 6 punky - other piles sound OK					
	Delcan 2005 Notes:					
P01	- Approaches low					
P06-P09	- Bent 11 - urgent pile cap replacement from last year not yet done - cap crushing					
	- Bent 7 - piles 2 and 3 punky, pile 4 OK					
	- Bent 8 - piles 2 and 6 punky (piles 4 and 5 seem to be OK)					
	Delcan 2004 Notes:					
P01	- Approaches uneven					
P03	- Ballast deck ties OK					
P04	- Inspected under traffic - no pumping evident near first approach					
	- Bent 6 - pile 4 hollow, pile 6 OK					
	- Bent 7 - pile 2 hollow, pile 6 OK					
	- Bent 8 - piles 2, 4 and 5 are punky near waterline					
	- Bent 9 - pile 6 punky near waterline					
	- Bent 10 - pile 4 is punky near waterline					
P09	- Bent 11 - pile cap crushed - urgent replacement required					
P02	- Debris in channel on right					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
Urgent	Replace pile cap on bent 11 - \$5,000					
3 years	Post bent 8 - piles 2 and 6 - \$5,000					
5 years	Post bents - \$20,000					
	Banding program for bent 14 pile cap					

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Relmer					
Inspection Date:	May 22, 2006					
Steel Structure (Girders/Beams)						
Structure	DPG	Deck Typ	Open	Crossing	Stream	
# Spans	2	Length	100	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	1910	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers			
Channel/Road		Fair	Floor Beams		Fair	
Approach		Fair	Girders/Truss/Slab		Fair	
Deck		G/F/P/B	Top Flange		Fair	
Ties (Open Deck)		Fair	Bottom Flange		Fair	
Tie Spacers		Fair	Web/Diagonals		Fair	
Track		Fair	Bearing Stiffeners		Fair	
Footwalk			Bracing		Fair	
Handrail			Bearngs		Fair	
			Overall Rating:		Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P01	- First approach a bit low this year					
P03	- Open deck - 12 reject ties this year					
P09	- Pier 1 - right side - monitoring cracking - OK for now					
	Delcan 2005 Notes:					
	- Approaches OK					
	- 6/99 reject ties (8%)					
	Delcan 2004 Notes:					
P01	- Approaches a bit low					
P03	- 5/99 reject ties (5%)					
P12,P06	- Pier 1 - crack below right bearing on upmile face only - monitor					
P08	- Abutment 1 - right bearing seat - some cracking at previous repair - monitor					
	UMA 2003 Notes:					
	12/99 ties poor. Extensive delamination of abutment 1 concrete. Backwall is horizontally cracked 1/2" in 2 locations. Pier 1 concrete is scaling. Plan on concrete repairs to pier and abutment #1.					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
Monitor	Crack on upmileage face of Pier 1					

Greenville 87.40

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer					
Inspection Date:	May 22, 2006					
Timber Trestle Structure with Steel Mainspan(s)						
Structure	PT/DPG	Deck Type	Open	Crossing	River	
# Spans	7	Length	165	Access:	< 1/2 mile	
# Tracks	1	Height		Flow Dir		
Year Built	1914	Alignment	T			Greenville 87.4 Flat River
General		G/F/P/B	Superstructure		G/F/P/B	Substructure
Scour		Fair	Stringers		Poor	Bridge Seats/Caps
Channel/Road		Fair	Floor Beams			Abuts/Backwalls
Approach		Fair	Girders/Truss/Slab		Fair	Piers, Towers, Bents
Deck		G/F/P/B	Top Flange		Fair	Misc
Ties (Open Deck)		Poor	Bottom Flange		Fair	Guard Rail
Tie Spacers		Fair	Web/Diagonals		Fair	
Track		Fair	Bearing Stiffners		Fair	
Footwalk			Bracing		Fair	
Handrail			Bearngs		Fair	
						Overall Rating:
						Fair
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P12	- Span 7 - stringer 1 rotten and beginning to crush - other stringers OK for now					
P05,P06	- Span 1 - stringers 2 and 8 split but OK for now					
P03	- Open deck on DPG mainspans - 18 reject ties on mainspans					
	Delcan 2005 Notes:					
	- Approaches OK					
	- 18/99 reject ties (18%)					
	- Span 1 - stringers 2 and 8 split					
	- Span 7 - Stringer 1 rotten					
	Delcan 2004 Notes:					
P01	- Approaches high					
P03	- 17/99 reject ties (17%)					
P04	- Ballast deck ties on approach spans poor					
P12	- Span 1 - stringer 2 splitting vertically					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
1 year	Replace stringer 1 - bents 6 to 8 - \$6,000					

Greenville 88.20

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer					
Inspection Date:	May 22, 2006					
Steel Structure (Girders/Beams)						
Structure	Steel Trestle	Deck Typ	Ballast	Crossing	River	
# Spans	17	Length	225	Access.	Road	
# Tracks	1	Height		Flow Dir		
Year Built	1918	Alignment	C			Greenville 88.20 Flat River
General		G/F/P/B	Superstructure		G/F/P/B	Substructure
Scour		Fair	Stringers		Good	Bridge Seats/Caps
Channel/Road		Fair	Floor Beams			Abuts/Backwalls
Approach		Fair	Girders/Truss/Slab			Piers, Towers, Bents
Deck		G/F/P/B	Top Flange			Misc
Ties (Open Deck)		Good	Bottom Flange			Guard Rail
Tie Spacers		Good	Web/Diagonals			
Track		Good	Bearing Stiffeners			
Footwalk			Bracing		Fair	
Handrail			Bearings			Overall Rating:
						Fair
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P01-P03	- No change in condition since 2005					
	- Since major repairs were relatively recent, detailed inspection of piles not yet reqd					
	Delcan 2005 Notes:					
	- No changes since 2004 inspection					
	Delcan 2004 Notes:					
P01	- Approaches OK					
P06	- Steel frame bents installed on cut timber piles - sill plates at varying elevations					
P05,P07	- Bents 4 and 16 not replaced after fire					
P02	- Open deck - all ties are new and in good condition					
	UMA 2003 Notes:					
	This bridge was burned down 2 years ago and repaired by steel frame bents and steel stringers. New deck. All fair. No action required					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 89.30

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer					
Inspection Date:	May 22, 2006					
Timber Trestle Structure with Steel Mainspan(s)						
Structure	PT/Beam	Deck Typ:	Open	Crossing	River	
# Spans	17	Length	277	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			Greenville 89.30 Flat River
General		G/F/P/B	Superstructure		G/F/P/B	Substructure
Scour		Fair	Stringers		Poor	Bridge Seats/Caps
Channel/Road		Fair	Floor Beams			Abuts/Backwalls
Approach		Fair	Girders/Truss/Slab			Piers, Towers, Bents
Deck		G/F/P/B	Top Flange			Misc
Ties (Open Deck)		Fair	Bottom Flange			Guard Rail
Tie Spacers		Fair	Web/Diagonals			
Track		Fair	Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
						Overall Rating:
						Poor
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P08	- Span 1 sinkhole in ballast deck					
P06	- Stringer 1 in span 1 - recently replaced - new stringer width is less					
P11,P12	- Timber sill plates of bents 12 and 13 are on concrete slabs so not as urgent					
	Delcan 2005 Notes:					
P02	- Bent 3 cap replaced					
P03	- Span 1 - stringer 1 replaced					
P12	- Stringer 1 crushing over bent 16 (not bent 18)					
	Delcan 2004 Notes:					
P01	- Approaches a bit low					
P03	- 0/28 reject ties (0%) for beam span					
P22,P23	- Ballast deck ties poor					
P04	- Sinkhole through ballast trough floor near bent 2					
P05,P06	- Span 1 - stringer 1 crushing and rotating out at bent 1 - to be replaced					
P09,P10	- Bent 3 pile cap crushing - urgent replacement					
P11	- Most bents are steel pipe piles with concrete pile caps - debris in river on right					
P12	- Stringer 2 from bents 3 to 5 - end rot					
P13	- Bent 5 - timber blocking on concrete caps is rotting					
P14	- Bent 13 - timber sill plate rotten and to be replaced					
P15	- Bent 14 - timber sill plate rotten and to be replaced					
P16,P17	- Bent 14 - pile cap starting to rot, post 4 is rotten and hollow					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
1 year	Replace stringer 1 over bent 16 - \$5,000					
3 years	Replace sill plates for bents 13 and 14 - \$10,000					
3 years	Replace pile caps for bents 1, 14 and 15 - \$15,000					

Greenville 89.31

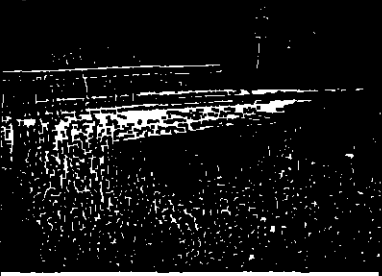
		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
O/H Highway Structure						
Structure	OH Via	Deck Typ	-	Crossing	Hwy	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	?	Alignment	T			
Greenville 89.31 Hwy. M-44 O/H Via						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers			
Channel/Road		Good	Floor Beams			
Approach		Fair	Girders/Truss/Slab		Good	
Deck		G/F/P/B	Top Flange			
Ties (Open Deck)			Bottom Flange			
Tie Spacers			Web/Diagonals			
Track			Bearing Stiffners			
Footwalk		Good	Bracing			
Handrail			Bearings			
Overall Rating:					Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
	- No change in condition since 2005					
	Delcan 2005 Notes:					
	- No change in condition since 2004					
	Delcan 2004 Notes:					
P01	- Concrete deck on steel girders					
	UMA 2003 Notes:					
	- Not Inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					

Greenville 91.60

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:	Stan Reimer					
Inspection Date:	May 22, 2006					
Timber Trestle Structure						
Structure	PT	Deck Typ	Ballast	Crossing.	Stream	
# Spans	6	Length	82	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			Greenville 91.60 Stream
General		G/F/P/B	Superstructure		G/F/P/B	Substructure G/F/P/B
Scour		Fair	Stringers		Fair	Bridge Seats/Caps
Channel/Road		Fair	Floor Beams			Abuts/Backwalls
Approach		Fair	Girders/Truss/Slab			Piers, Towers, Bents
Deck		G/F/P/B	Top Flange			Misc
Ties		Fair	Bottom Flange			Guard Rail
Tie Spacers			Web/Diagonals			
Track		Fair	Bearing Stiffeners			
Footwalk			Bracing		Fair	
Handrail			Bearngs			
						Overall Rating:
						Fair
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
	- this bridge has urgent work that has not been done					
P04	- Bent 1 - stumps 1 and 5 are rotten					
P05	- Bent 2 - piles 3 and 4 are posted, piles 1, 5 and 6 are rotten - urgent repair reqd					
P08	- Bent 4 - piles 1, 2, 3 and 6 are reject - needs framing too					
P09,P10	- Bent 7 pile cap is rotten on left					
	Delcan 2005 Notes:					
P03	- Bent 1 - stump 4 is rotten					
P04	- Bent 2 - piles 1, 2, 5 and 6 are rotten - frame bent now					
P07	- Bent 5 - pile 1 is gone, piles 2, 3 and 4 are punky					
P09-P10	- Bent 7 - pile cap rotten					
	Delcan 2004 Notes:					
P01	- Approaches OK					
	- Ballast deck ties OK					
P06	- Bent 2 - piles 1, 2 and 5 are hollow, piles 3 and 4 are posted					
P07	- Bent 3 - Pile 4 completely hollow					
P08,P10	- Bent 4 - pile 3 is rotten near waterline, pile 2 is punky					
P11	- Bent 5 - pile 1 is crushed, others sound punky - frame within 1 year					
P16,P18	- Bent 6 - pile cap split and to be banded, post 1 split and to be banded					
P15	- Bent 7 - pile cap is split on right					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
Urgent	Frame bents 2, 4 and 5 - \$30,000					
1 year	Post bent 3 - pile 4, bent 4 - pile 3 - \$10,000					
1 year	Replace bent 7 pile cap - \$5,000					
	Banding Program - Bent 6 - cap and post 1					
	Consider replacement with culvert for \$35,000					

[illegible]

Greenville 94.70

		Bridge Inspection Report				
		Mid-Michigan Railway				
		Greenville				
		Michigan				
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Steel Structure (Girders/Beams)						
Structure	on Bridge	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	?	Alignment	T			
Greenville 94.70 Road Bridge						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour			Stringers		Bridge Seats/Caps	
Channel/Road			Floor Beams		Abuts/Backwalls	
Approach			Girders/Truss/Slab		Piers, Towers, Bents	
Deck		G/F/P/B	Top Flange		Misc	
Ties (Open Deck)			Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track			Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
Overall Rating:					Poor	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P03	- Timber bearing blocks for rail stringers are rotting at ends - OK for now					
	Delcan 2005 Notes:					
	- No change in condition since 2004					
	Delcan 2004 Notes:					
P01	- This is a road bridge adjacent to and crossing the tracks					
P04	- Superstructure is steel rails on top of timber abutments, timber deck					
	- Consider closing this bridge or turning it over to road agency					
	- Otherwise, consider replacing with a culvert when bridge starts to fail					
P01	- Bridge is posted for 15 tons					
	UMA 2003 Notes:					
	- Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 95.50

[illegible]

Greenville 97.90

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
Culvert						
Structure	6' x 8' RCE	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	C			
General		Superstructure		Substructure		
Scour		Stringers		Bridge Seats/Caps		
Channel/Road		Floor Beams		Abuts/Backwalls		
Approach		Girders/Truss/Slab		Piers, Towers, Bents		
Deck		Top Flange		Misc		
Ties (Open Deck)		Bottom Flange		Guard Rail		
Tie Spacers		Web/Diagonals				
Track		Bearng Stiffners				
Footwalk		Bracing				
Handrail		Bearngs				
				Overall Rating:		
				Fair		
COMMENTS						
Photo #	Remarks					
Delcan 2006 Notes:						
P01-P04	- No change in condition since 2005					
	- Overgrown with brush					
Delcan 2005 Notes:						
- No change in condition since 2004						
Delcan 2004 Notes:						
P01	- Approaches OK					
P02	- Some spalling in headwall of outlet on left					
UMA 2003 Notes:						
	- Not Inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

[illegible]

Delcan Inc

Greenville 99.85

[illegible]

Greenville 99.90

Bridge Inspection Report						
	Mid-Michigan Railway Greenville Michigan					
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Culvert						
Structure	CMP	Deck Typ	-	Crossing.	Stream	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	Substructure G/F/P/B
Scour	Fair	Strngers			Brdge Seats/Caps	
Channel/Road	Fair	Floor Beams			Abuts/Backwalls	Fair
Approach	Fair	Girders/Truss/Slab		Fair	Piers, Towers, Bents	
Deck	G/F/P/B	Top Flange			Misc	G/F/P/B
Ties (Open Deck)		Bottom Flange			Guard Rail	
Tie Spacers		Web/Dagonals				
Track	Fair	Bearing Stiffners				
Footwalk		Bracing				
Handrail		Bearngs			Overall Rating:	Fair
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes: - No change in condition since 2005					
	Delcan 2005 Notes: - No change in condition since 2004					
	Delcan 2004 Notes: P01 - Approaches OK - Pipe culvert					
	UMA 2003 Notes: - Not Inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 103.00

[illegible]

EXHIBIT 5 – RESPONSES

United States Department of Agriculture



Helping People Help the Land

Natural Resources Conservation Service

3001 Coolidge Road, Suite 250

East Lansing, MI 48823

T (517) 324-5270 / F (517) 324-5171 / www.mi.nrcs.usda.gov

October 29, 2007

Section of Environmental Analysis
Surface Transportation Board
1925 K Street, NW
Washington, DC 20423

**RE: Docket No. AB-364 (Sub-No. 11X), Mid-Michigan Railroad, Inc.
Abandonment Exemption in Kent and Montcalm Counties, MI**

We have reviewed the proposal to abandon 26.4 miles of rail line between milepost 104.9 at Lowell Michigan, and milepost 78.5 at Greenville, Michigan. Abandonment of the rail line will not result in the conversion of prime and unique farmland that is located adjacent to the proposed abandonment.

Thank you for this opportunity to comment on this proposal.

Sincerely,

A handwritten signature in cursive script that reads "Garry Lee".

GARRY LEE
State Conservationist

cc:

Louis E. Gitomer, Attorney, 600 Baltimore Ave., Suite 301, Towson, MD 21204

Carla Gregory, Area Conservationist, NRCS, Grand Rapids, MI

Steve Utic, District Conservationist, NRCS, Grand Rapids, MI

Brian Barclay, District Conservationist, NRCS, Stanton, MI



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Bishop Henry Whipple Federal Building
1 Federal Drive
Fort Snelling, MN 55111-4056

FWS/NWRS-RE - General
Railroad Abandonments

October 26, 2007

Surface Transportation Board
Section of Environmental Analysis (SEA)
1925 K Street, NW
Washington, D.C. 20423

Dear Sir/Madam:

Thank you for the opportunity to comment on the proposed abandonment of service on 26.4 miles of railroad line between MP 104.9 and MP 78.5, located in Kent and Montcalm Counties, Michigan, STB Docket No. AB-364 (Sub-No. 11X).

We have researched our ownerships in the vicinity and have determined we do not own any land or interests in land in the vicinity of the proposed rail line abandonments. We do not have any concerns regarding real estate matters in the abandonments.

Sincerely,

/s/ Patrick G. Carroll

Patrick G. Carroll
Senior Realty Officer
Division of Realty

cē: Louis E. Gitomer, Law Offices of Louis E. Gitomer

EXHIBIT C—FEDERAL REGISTER NOTICE

**MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT, IONIA, AND MONTCALM COUNTIES, MI**

Notice of Petition for Exemption to Abandonment

On February 20, 2008 Mid-Michigan Railroad, Inc. ("MMRR") filed with the Surface Transportation Board, Washington, D.C. 20423, a petition for exemption for the abandonment of a 24.70-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI, all of which traverses through United States Postal Service ZIP Codes 48809, 48838, 48887, and 49331 (the "Line") The Line for which the abandonment exemption request was filed includes the stations of Lowell, Belding, and Greenville

The Line does not contain federally granted rights-of-way. Any documentation in the railroad's possession will be made available promptly to those requesting it.

The interest of railroad employees of MMRR will be protected by *Oregon Short Line R Co —Abandonment—Goshen*, 360 I.C.C. 91 (1979).

MMRR has requested the Board to grant an exemption from the offer of financial assistance process. If the exemption is not granted, any offer of financial assistance will be due no later than 10 days after service of a decision granting the petition for exemption. All interested persons should be aware that following abandonment of rail service and salvage of the line, the line may be suitable for other public use, including interim trail use

Any request for a public use condition and any request for trail use/rail banking will be due no later than 20 days after notice of the filing of the petition for exemption is published in the Federal Register.

MMRR has proposed, and we are adopting the following procedural schedule for this proceeding.

February 20, 2008—Petition for Exemption filed.

March 11, 2008—Due date for Notice of Petition to be published in the *Federal Register*.

April 4, 2008—Due date for protests and comments, including opposition case in chief, and for public use and trail use requests.

April 16, 2008—Due date for MMRR's reply to opposition case and for MMRR's response to trail use requests.

June 6, 2008—Due date for service of decision on the merits.

June 16, 2008—Due date for offers of financial assistance, unless exempted by the Board.

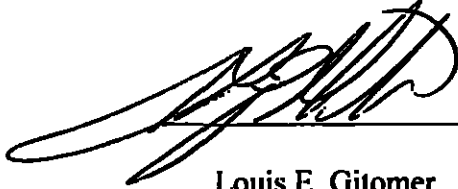
Persons seeking further information concerning abandonment procedures may contact the Surface Transportation Board or refer to the full abandonment or discontinuance regulations at 49 CFR Part 1152. Questions concerning environmental issues may be directed to the Board's Section of Environmental Analysis. An environmental assessment (EA) (or environmental impact statement (EIS), if necessary) prepared by the Section of Environmental Analysis will be served upon all parties of record and upon any agencies or other persons who commented during its preparation. Any other persons who would like to obtain a copy of the EA (or EIS) may contact the Section of Environmental Analysis. EAs in these abandonment proceedings normally

will be made available within 60 days of the filing of the petition. The deadline for submission of comments on the EA will generally be within 30 days of its service.

EXHIBIT D-NEWSPAPER CERTIFICATION

CERTIFICATE OF PUBLICATION

The undersigned hereby certifies that notice of the proposed abandonment in Docket No. AB-364 (Sub-No. 14X) was advertised on February 19, 2008 in the Grand Rapids Press, a newspaper of general circulation in Kent, Ionia, and Montcalm Counties, MI, as required by 49 C.F.R. § 1105.12.

A handwritten signature in black ink, appearing to read 'L. Gitomer', written over a horizontal line.

Louis F. Gitomer
February 20, 2008

Mid-Michigan Railroad, Inc. ("MMRR") gives notice that on or about February 20, 2008 it intends to file with the Surface Transportation Board, Washington, DC 20423, a petition for exemption under 49 U.S.C. 10505 from the prior approval requirements of 49 U.S.C. 10903, et seq., permitting the abandonment of a 24.7-mile rail line between milepost 103.2 near Lowell and milepost 78.5 near Greenville at the end of the line, which traverses through United States Postal Service ZIP Codes 48809, 48838, 48887, and 49331 in Kent, Ionia, and Montcalm Counties, MI (the "Line"). The proceeding has been docketed as No. AB-364 (Sub-No. 14X).

The Board's Section of Environmental Analysis (SEA) will generally prepare an Environmental Assessment (EA), which will normally be available 60 days after the filing of the petition for abandonment exemption. Comments on environmental and energy matters should be filed no later than 30 days after the EA becomes available to the public and will be addressed in a Board decision. Interested persons may obtain a copy of the EA or make inquiries regarding environmental matters by writing to SEA, Surface Transportation Board, Washington, DC 20423 or by calling SEA at 202-245-0295

Appropriate offers of financial assistance to continue rail service can be filed with the Board. Requests for environmental conditions, public use conditions, or rail banking/trails use also can be filed with the Board. An original and 10 copies of any pleading that raises matters other than environmental issues (such as trails use, public use, and offers of financial assistance) must be filed directly with the Board's Office of the Secretary, 395 E Street, SW, Washington, DC 20423 [See 49 CFR 1104.1(a) and 1104.3(a)], and one copy must be served on applicants' representative [See 49 CFR 1104.12(a)]. Questions regarding offers of financial assistance, public use or trails use may be directed to the Board's Office of Congressional and Public Services at 202-245-0233. Copies of any comments or requests for conditions should be served on the applicant's representative: Louis E. Gitomer, Law Offices of Louis E. Gitomer, 600 Baltimore Avenue, Suite 301, Towson, MD 21204, (410) 296-2250, Lou_Gitomer@verizon.net.

EXHIBIT E—CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

Pursuant to 49 C.F.R. §1152.60(d), the undersigned hereby certifies that the
Petition for Exemption in Docket No. AB-364 (Sub-No. 14X), *Mid-Michigan Railroad,
Inc Abandonment Exemption—in Kent, Ionia, and Montcalm Counties, MI* was mailed
via first class mail, postage prepaid, on February 20, 2008, to the following parties:

State Public Service Commission

Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Public Service Commission
6545 Mercantile Way, Suite 7
Lansing, MI 48909

Military Surface Deployment and Distribution Command Transportation Engineering Agency

SDDC T&EA
AT&T Railroads for National Defense
720 Thimble Shoals Blvd.
Suite 130
Newport News, VA 23606-2574

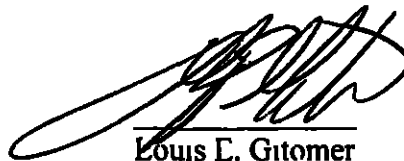
National Park Service

U.S. Department of Interior
National Park Service
Land Resources Division
1201 Eye Street, N.W.
Washington, DC 20005

Ms. Cherri Espersen
National Recreation Trail Coordinator
Rivers, Trails and Conservation Assistance Program National Park Service
1849 C Street, NW (Org Code 2240)
Washington, DC 20240-0001

U.S. Department of Agriculture

U S. Department of Agriculture
Chief of the Forest Service
4th Floor, NW
Sidney R. Yates Building
201 14th Street, S.W.
Washington, DC 20250

A handwritten signature in black ink, appearing to read 'Louis E. Gitomer', written over a horizontal line.

Louis E. Gitomer
February 20, 2008

**EXHIBIT F-MARK D. GARVIN VERIFIED
STATEMENT**

MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT, IONIA, AND MONTCALM COUNTIES, MI

VERIFIED STATEMENT OF MARK D. GARVIN

My name is Mark D. Garvin and I am Chief Engineer of RailAmerica, Inc. ("RailAmerica"), a shortline holding company that controls Mid-Michigan Railroad, Inc. ("MMRR"). I have a B.S. in Civil Engineering from Michigan Technological University. My engineering work in the railroad industry began over 25 years ago on Conrail as a management trainee. I soon became an assistant track supervisor in charge of track maintenance. I joined Grand Trunk Western Railroad Company as a track supervisor, in charge of system track gangs performing capital projects. I joined RailAmerica as a Project Manager and became Chief Engineer in January 1992. My current duties include the acquisition of track equipment and material, the selection and training of maintenance of way personnel, the engineering evaluation of potential acquisition properties, and the development of maintenance and rehabilitation plans for properties acquired by RailAmerica.

I am familiar with the 24.70-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI (the "Line").

I will discuss the value of the track and materials on the Line, the cost of rehabilitation of the Line, and the annual maintenance-of-way costs once the Line is rehabilitated.

1. Value of Track and Materials. Each of RailAmerica's subsidiary railroads maintain an inventory of track and materials on its lines under my supervision as Chief Engineer. In addition, each railroad conducts regular inspections of its lines to maintain the accuracy of the inventory and the condition of the inventory. Attached as the Exhibit to this verified statement is the list of inventory on the Line.

The inventory includes rail, other track material ("OTM"), ties, signals and turnouts. The rail, OTM, and turnouts are classified as relay, reroll, or scrap. The valuations are based on recent quotations obtained by MMRR and RailAmerica from rail suppliers and quotations in national publications. Liquidation costs are based on my experience with the cost of removal and transportation and recent quotations received by MMRR and RailAmerica for removal and transportation

Although the Exhibit values ties, I have been told that the trail user has indicated a desire to retain the ties. This is a benefit of \$42,525 to MMRR since it will cost more to remove and transport the ties (\$323,190), than their value (\$280,665). Therefore, the net liquidation value of the railroad asset will be \$2,460,077.

2. Rehabilitation. It is my judgment based on my long experience in the railroad industry that \$125,000 in capital expenditures is required to rehabilitate the Line so that it will remain in Federal Railroad Administration Class 1 condition. MMRR will replace 1,700 ties. MMRR will resurface the entire Line once the ties are replaced in order to ensure a relatively smooth surface to operate over.

3. Maintenance-of-way. I have reviewed with the four Field Chief Engineers for the RailAmerica railroads the recent costs per mile adopted by the Surface Transportation Board for Class III railroads for maintenance of way costs. Those costs

range between \$4,500 and \$6,000 per mile. Based on consultation and experience, I believe use of \$5,000 per mile is conservative. The reason that I believe such cost is valid is based on the costs to be incurred in the initial maintenance of the Line of \$235,000, which consists of brush cutting costs of \$38,000, D Car rail \$100,000, \$75,000 to replace ties and resurface rail, and \$22,000 to clear water ways and repair washouts.

In addition, there are inspection costs on the Line. The Line is inspected on a weekly basis by one employee. The inspection usually takes three to five hours to complete. The hourly wages for an employee inspecting track on MMRR are \$15.88. In addition, employee benefits are about 71.02 percent of wages, and general administrative costs of 50 percent of wages. Therefore, to inspect the Line costs about \$40.70 per hour. Based on the average amount of time it takes to inspect the Line of four hours per week, inspection costs MMRR \$162.80 per week, and \$8,465.60 per year.

On this 24.70-mile line, the average per mile cost of maintenance would be about \$9,856. Therefore, in my professional judgment and based on my experience, I feel very confident using an average maintenance of way cost of \$5,000 per mile or \$123,500 for the Line.

VERIFICATION

I, Mark D Garvin, verify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement.

Executed on February 14, 2008.


Mark D. Garvin

EXHIBIT

Liquidation Value of Railroad Asset

MMRR -Greenville Sub - MP 103.2 - 78.5

November 14, 2007

Rail										
Weight	Jnt./CWR	Miles	NT/Mile	Total NT	Total GT	Class	Price NT	Price GT	Total \$ NT	Total \$ GT
110lb	Jnt	5 65	183 92	1039 15	927 81	Relay	\$550		\$571,531	
112lb	Jnt	1 9	187 26	355.80	317.68	Relay	\$600		\$213,481	
122lb	Jnt	0 1	203 98	20 40	18 21	Relay	\$500		\$10,199	
130lb	CWR	2	217 36	434.72	388.14	Relay	\$650		\$282,568	
131lb	CWR	4 8	219 03	1051 35	938.71	Relay	\$650		\$683,380	
131lb	Jnt	1 2	219 03	262 84	234 68	Relay	\$600		\$157,703	
110lb	Jnt	2 65	183 92	487 39	435 17	Reroll		\$335		\$145,781
131lb	Jnt	0 9	219 03	197 13	176 01	Reroll		\$335		\$58,963
90lb	Jnt	6 88	150 48	1035 30	924 38	Reroll		\$335		\$309,666
90lb	Jnt	2 27	145 73	330.80	295 36	Scrap		\$240		\$70,886
Totals		28.35		5214.88	4656.14	Total Rail Value			\$2,504,159	

OTM										
Weight	Jnt./CWR	Miles	NT/Mile	Total NT	Total GT	Class	Price NT	Price GT	Total \$ NT	Total \$ GT
110lb	Jnt	8 3	57 0	473 10	422.41	Relay	\$350		\$165,585	
112lb	Jnt	1 9	84 0	159.60	142.50	Relay	\$350		\$55,860	
122lb	Jnt	0 1	86 0	8 60	7 68	Relay	\$350		\$3,010	
130lb	CWR	2	82 5	165.00	147 32	Relay	\$350		\$57,750	
131lb	CWR	4 8	82 5	396 00	353 57	Relay	\$350		\$138,600	
131lb	Jnt	1 2	93 2	111 84	99 86	Relay	\$350		\$39,144	
131lb	Jnt	0 9	93 2	83 88	74 89	Scrap		\$265		\$19,847
90lb	Jnt	6 88	50 0	344 00	307 14	Scrap		\$265		\$81,393
90lb	Jnt	2 27	50 0	113 50	101.34	Scrap		\$265		\$26,855
Totals		28.35		1855.52	1656.71	Total OTM Value			\$588,043	

Ties (Removal & Market)						Signal/Appliances			
Class	%	Miles	Total Ties	Price Ea.	Total	Type	Quantity	Unit Price	Total
#1 Relay	10%	28 4	8505	\$8	\$68,040	Lights	12	\$2,500	\$30,000
#2 Relay	25%	28 4	21262 5	\$6	\$127,575	Gates	0	\$3,500	
Landscape	25%	28 4	21262 5	\$4	\$85,050	Total all Signals			
Scrap	40%	28 4	34020	\$0					\$30,000
Total Tie Value					\$280,665				

Turnouts										
Weight	Type	Qty.	NT/TO	Total NT	Total GT	Class	Price EA	Price GT	Total \$ Each	Total \$ GT
131lb	No 10	8	4 65	37.20	33.21	relay	\$8,000		\$64,000	
112lb	No 10	3	4 52	13.56	12 11	scrap		\$265		\$3,208
110lb	No 10	3	4 50	13 50	12 05	scrap		\$265		\$3,194
110lb	No 10	1	4.50	4 50	4 02	scrap		\$265		\$1,065
90lb	No 10	2	1.93	3 86	3 45	scrap		\$265		\$913
Totals		17		72.62	64.84	Total OTM Value			\$72,381	

Liquidation Costs				
	Unit	Cost	Quantity	Total
Dismantle Track (CWR)	NT	\$65	2047 NT	\$133,059 8
Dismantle Trk (Jointed)	NT	\$50	4339 NT	\$216,940 6
Transport Rail & OTM	NT	\$35	7143 NT	\$250,005 8
Remove Ties	EA	\$2	85,050	\$170,100 0
Transport Ties	EA	\$3	51,030	\$153,090 0
Remove Relay Turnouts	EA	\$2,500	17	\$42,500 0
Remove Crossing Signal	EA	\$1,500	12	\$18,000 0
Restore Crossings	EA	\$2,000	37	\$70,000 0

Gross Liquidation Value	\$3,475,248
Total Liquidation Costs	\$1,057,696
Net Liquidation Value	\$2,417,552

**EXHIBIT G—ROBERT M. FRELICH, JR. VERIFIED
STATEMENT**

**MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT, IONIA, AND MONTCALM COUNTIES, MI**

VERIFIED STATEMENT OF ROBERT M. FRELICH, JR.

My name is Robert M. Frellich, Jr. and I am Director of Finance of RailAmerica, Inc. ("RailAmerica"), a shortline holding company that controls Mid-Michigan Railroad, Inc. ("MMRR"). The purpose of this verified statement is to describe how I developed the revenues and costs of MMRR over the 24.70-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI (the "Line").

I have been Director of Finance for last two years and was Director of Planning for prior nine years with RailAmerica. As Director of planning, I was responsible for planning, analyzing traffic profitability and financial results, acquisition modeling, and budgeting for RailAmerica's subsidiary railroads. My prior experience with Southern Pacific was as Director of Budgeting for Operating Department.

My current duties include responsibility for planning, cost modeling, profitability analysis, analyzing financial results, acquisition modeling and budgeting of railroads for two regions.

1. Background. The Surface Transportation Board (the "Board") has developed a very sophisticated methodology in 49 C.F.R. Part 1152 Subpart D for calculating revenues and avoidable costs of a line of railroad that a railroad is seeking to abandon. The predicate for using these procedures is maintaining data in accordance with the Branch Line Accounting System (the "BLAS"). Only Class I railroads are required to

maintain records in accordance with the BLAS. As a Class III railroad, MMRR does not maintain its records in accord with the BLAS.

Using the data and resources available to me from the MMRR, I have tried to present the Board with an accurate analysis of the revenue generated by the Line and the costs of operating the Line. In conducting this analysis, I have developed a Forecast Year based on traffic from customers on the Line who will continue you use rail service.

2. Forecast Year Traffic. The main customer on the Line, Frigidaire Corporation moved its facility to South Carolina and Mexico in early 2006 and made its last shipment over the Line in April 2006. Since Frigidaire stopped using rail service on the Line, the only user of service has been Crop Production Service (“CPS”). In 2006, CPS shipped one car in December. CPS has not used rail service on the Line in 2007 or 2008 to date. Therefore, I will calculate the revenues and costs of operation based on the annual shipment of one carload.

1. Revenue. Revenue generated by CPS on the Line in 2006 was \$494.00.

2. Avoidable Costs. In calculating the avoidable costs of operating over the Line, I will determine the costs of operation and use the costs to maintain the Line prepared by Mr. Garvin.

a. Costs of Operation. The cost to operate a train on the Line depend on the amount of time spent on the Line, the numbers of trips on the Line, the number of employees and their compensation, the number of locomotives used and their cost, the cost of fuel, and the overhead costs that include general and administrative costs, depreciation, and the maintenance of way costs as developed by Mr. Garvin.

An average trip to serve CPS takes about six hours round trip. Each time CPS is served, it requires two trips, one to drop off a car and another to pick up the car. Because MMRR is serving CPS once per year, MMRR cannot combine trips to pick up and deliver cars at the same time.

In 2008, there are two people in the train crew serving CPS. I foresee a two person train crew for at least the next two years, including the Forecast Year. Hourly wages for each crew member is \$17.21 per hour and their benefits are equal to about 71.02 percent of wages. Therefore, for the two six hour trips to CPS, MMRR's employee costs are \$706.38 ($2 \times 2 \times 6 \times 17.21 \times 1.7102$).

MMRR uses one 2000 horsepower locomotive to serve CPS. Daily rental of the locomotive from RailAmerica is \$114.00. The locomotive burns about 6.5 gallons per hour based on grade and amount of tonnage being hauled, and for 2007, the average cost per gallon was \$2.27. I do not foresee the cost of fuel dropping in 2008. The locomotive fuel cost for two six hour trips is \$177.06 ($(2 \times 6 \times 6.5 \times 2.27)$) and the locomotive rental is \$57.00 ($114 \times 2 \times 6 / 24$).

Based on the above costs; \$706.38 (crew costs) plus \$177.06 (locomotive fuel) plus \$57.00 (for locomotive rental) and \$470.22 (50% for overhead), the total yearly costs are \$1,410.66

b. Maintenance of Way Costs. Mr. Garvin has developed an annual maintenance of way cost of \$123,500 for the Line, which I adopt and will use.

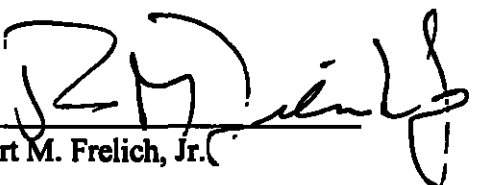
c. Summary of Avoidable Costs. The annual operating costs on the Line are \$1,410.66. Annual maintenance of way costs on the Line are \$123,500. Total avoidable costs on the Line are \$124,910.66

3. Avoidable losses. The annual revenue projected for the Line is \$494.00.
Annual avoidable costs are \$124,910.66, resulting in an avoidable loss of \$124,416.66.

VERIFICATION

I, Robert M. Frelich, Jr., verify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement.

Executed on February 15, 2008.



Robert M. Frelich, Jr.

**EXHIBIT H—TODD N. CECIL VERIFIED
STATEMENT**

**MID-MICHIGAN RAILROAD, INC.–ABANDONMENT EXEMPTION–
IN KENT, IONIA, AND MONTCALM COUNTIES, MI**

VERIFIED STATEMENT OF TODD N. CECIL

My name is Todd N. Cecil. I am employed as Vice President-Real Estate, for RailAmerica, Inc., and the Mid-Michigan Railroad, Inc. (“MMRR”). My credentials are provided in the attached Exhibit. The purpose of this statement is to provide the Surface Transportation Board with the valuation of the real estate on the 24.7-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI (the “Line”).

I have negotiated a Memorandum of Understanding (the “MOU”) with the West Michigan Trails and Greenways Coalition to sell the real estate in the Line and the 15.83-mile rail line between southeast of Lowell, milepost 137.83, and east of Prairie Center, milepost 122.00, the end of the line, in Kent and Ionia Counties, MI for interim trail use/rail banking. Based on these negotiations, I expect to sell both lines for about \$2,300,000. Based on the acreage and other relevant factors, the Line contains about 56 percent of the value in the transaction or \$1,288,000. In my professional opinion, this is a very reasonable valuation for the Line.

VERIFICATION

I, Todd N. Cecil, verify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement.

Executed on February 15, 2008.



Todd N. Cecil

EXHIBIT-QUALIFICATIONS OF MR. CECIL

My office address is 1355 Central Parkway South, Suite 700, San Antonio, Texas 78232. I have been employed by RailAmerica since its acquisition of RailTex, Inc. in February 2000. Prior to that time I was employed by RailTex for seven years (since February 1993), most recently in the position of Vice President – Real Estate.

My current duties and responsibilities include the management, development and disposition of the various real estate interests included within RailAmerica's international railroad portfolio. These real estate interests are located all throughout the U.S., Canada and Chile. Included in my duties are the appraising of various interests in railroad-owned real estate, reviewing the appraisals of others, and handling negotiations for sales, leases, acquisitions and other real estate transactions.

My prior railroad-related real estate experience consists of ten years with various subsidiaries of CSX Transportation, Inc. (including Chessie Resources, Inc., CSX Resources, Inc., Chessie Systems, and CSX Real Property, Inc.) between 1980 and 1990. During this period I rose through the corporate ranks to the level of Regional Manager, Great Lakes, with responsibility for the management of all CSX real estate holdings in Michigan, Ontario, and portions of Indiana and Illinois (including Chicago).

Also, for three years between my employment with CSX and RailTex (1990-1993), I was employed by Trerice Tosto, a metro-Detroit full-service real estate company in the position of Vice-President of the Appraisal and Consulting Division. During this time I was involved in the appraisal of many types of income producing properties (including industrial, commercial, residential and special purpose properties), and also

provided corridor and other real estate valuation consulting services to railroad and utility companies.

I am a 1977 graduate of Bowling Green State University (Bowling Green, Ohio) with a Bachelor of Arts Degree in Geography (Regional Planning). I also earned a Master of Arts Degree in Geography from the same university in 1980.

I have successfully completed numerous real estate appraisal courses offered by the Appraisal Institute (formerly the American Institute of Real Estate Appraisers) including:

- Real Estate Appraisal Principles
- Basic Valuation Procedures
- Capitalization Theory and Technique - Part 1
- Capitalization Theory and Technique - Part 2
- Capitalization Theory and Technique - Part 3
- Case Studies in Real Estate Valuation
- Valuation Analysis and Report Writing
- Investment Analysis
- Standards of Professional Practice
- Real Estate Disclosure
- Litigation Valuation
- Internet Search Techniques for Real Estate Appraisers
- GIS Applications for Real Estate Appraisal
- Appraising From Blueprints and Specifications
- Analyzing Operating Expenses
- Business Practices and Ethics

In summary, my professional railroad real estate experience includes over 20 years of appraising, selling, leasing, and managing railroad properties. Included in this experience are numerous railroad corridor valuation and disposition projects. These

properties include numerous railroad corridors and railroad corridor segments (including urban, suburban, and rural) running through diverse neighborhood types and consisting of a wide spectrum of highest and best uses.

I have also prepared and reviewed appraisals and valuation studies of virtually all types of property (commercial, industrial, residential, special purpose, railroad corridors, etc.) located in over twenty (20) states located throughout the country, in Canada, and in Chile.

In addition, over the years I have been involved in negotiating hundreds of purchase, lease and sale transactions involving railroad real estate properties. This experience has provided me with unique insight into the value potential of railroad real estate, the potential motivations of purchasers for these properties, as well as a feel for the marketability of railroad properties of nearly all potential land uses.

EXHIBIT I—ROBET DINE VERIFIED STATEMENT

MID-MICHIGAN RAILROAD, INC.—ABANDONMENT EXEMPTION—
IN KENT, IONIA, AND MONTCALM COUNTIES, MI

VERIFIED STATEMENT OF ROBERT DINE

My name is Robert Dine. I am employed as Assistant General Manager, for the Mid-Michigan Railroad, Inc. ("MMRR"). My address is 432 East Grove Street, Greenville, MI 48838. The purpose of this statement is to confirm that the last traffic to move over the 24.7-mile rail line between Lowell, milepost 103.20, and Greenville, milepost 78.50, at the end of the line in Kent, Ionia, and Montcalm Counties, MI (the "Line") occurred in December 2006.

I am responsible for all operations on the MMRR. Part of my responsibility is to be aware of the traffic moving over all of the lines the MMRR. I have reviewed the MMRR's records and can conclude that no traffic moved over the Line in 2007 and none has moved so far in 2008. In addition, the beginning of the abandonment in Lowell is north of any existing shippers who use the Line so that they will continue to receive service after the Line is abandoned.

VERIFICATION

I, Robert D. Dine, verify under penalty of perjury under the laws of the United States that the foregoing is true and correct. Further, I certify that I am qualified and authorized to file this Verified Statement.

Executed on February 8, 2008.

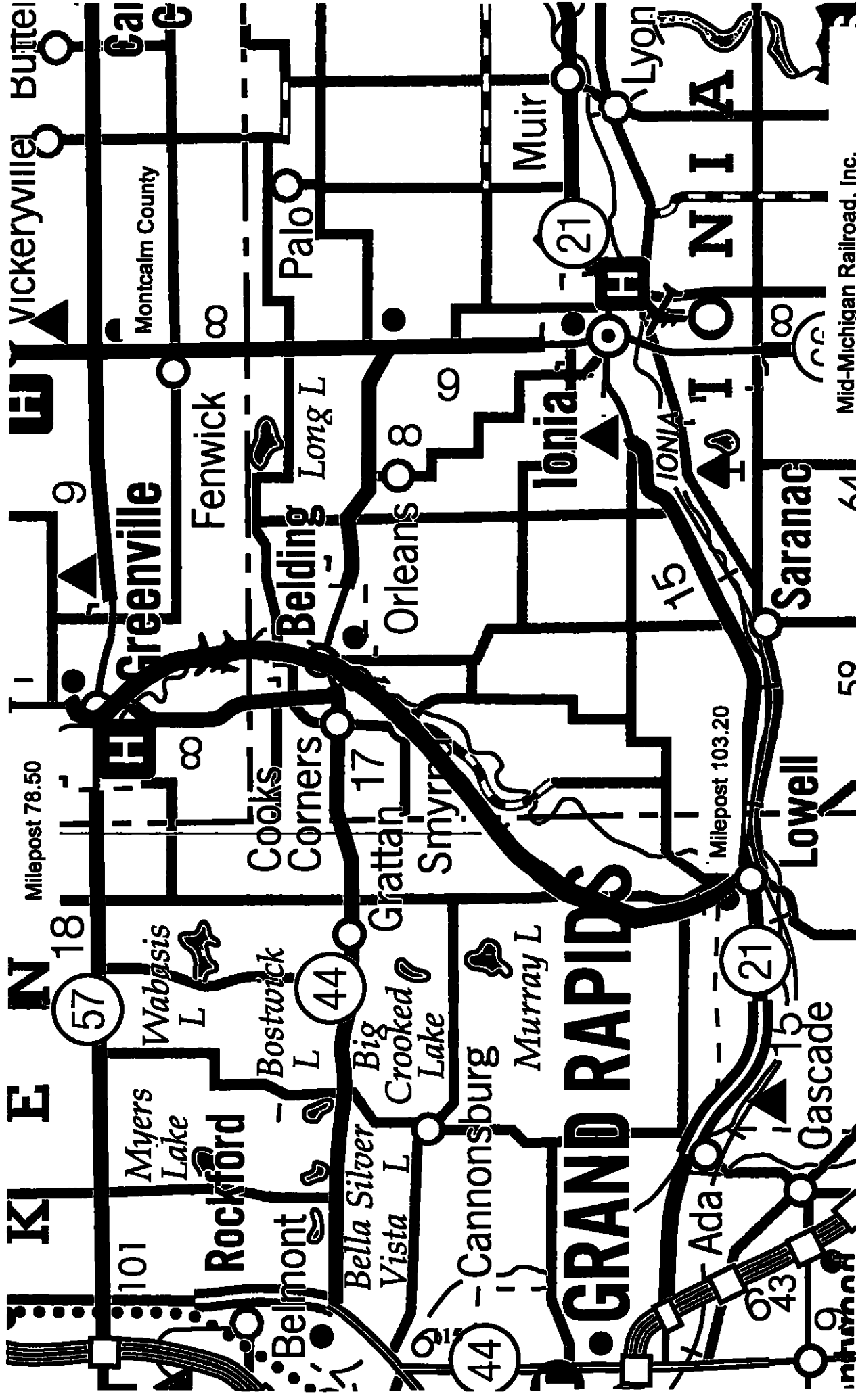


Robert D. Dine

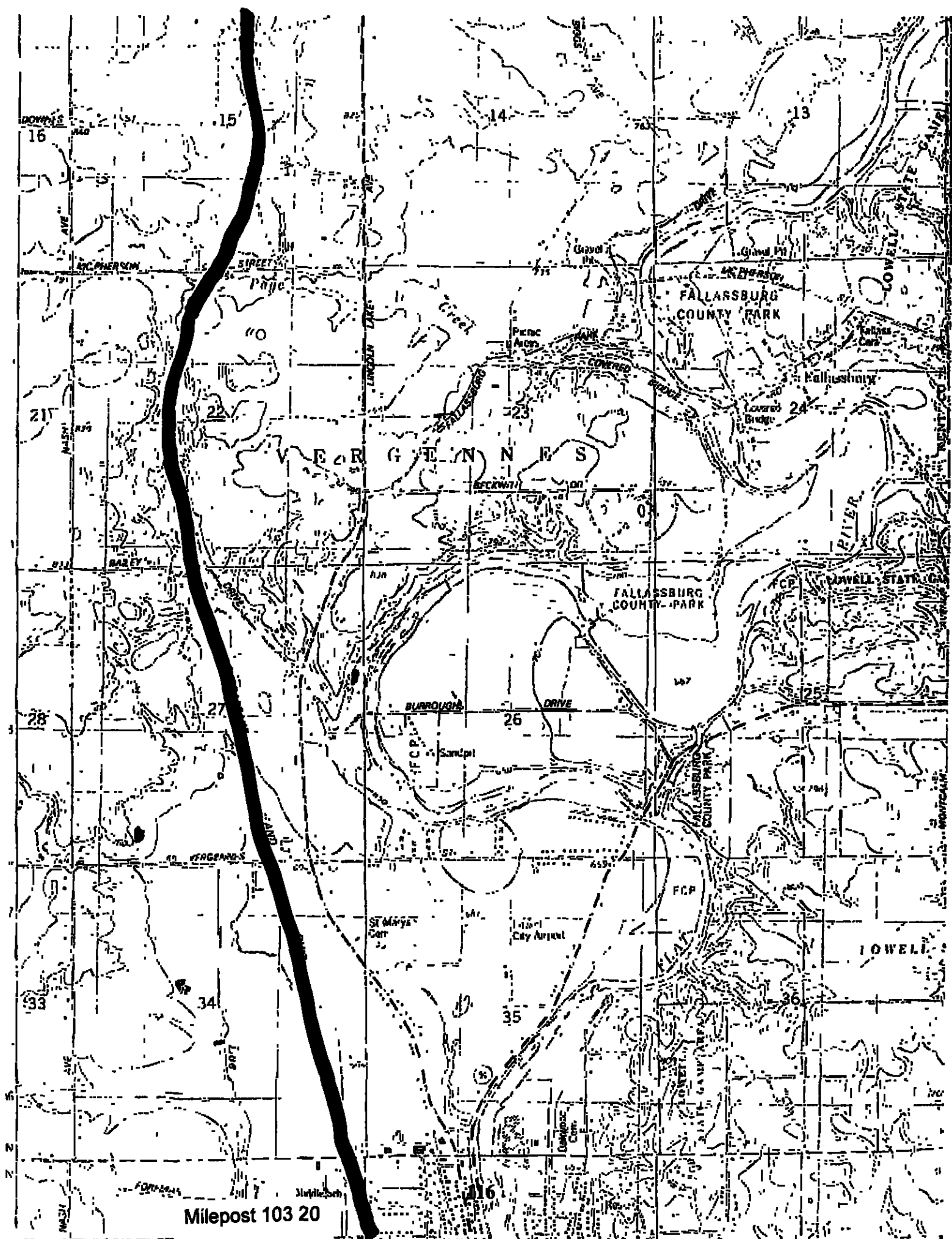
EXHIBIT J—COLOR EXHIBITS

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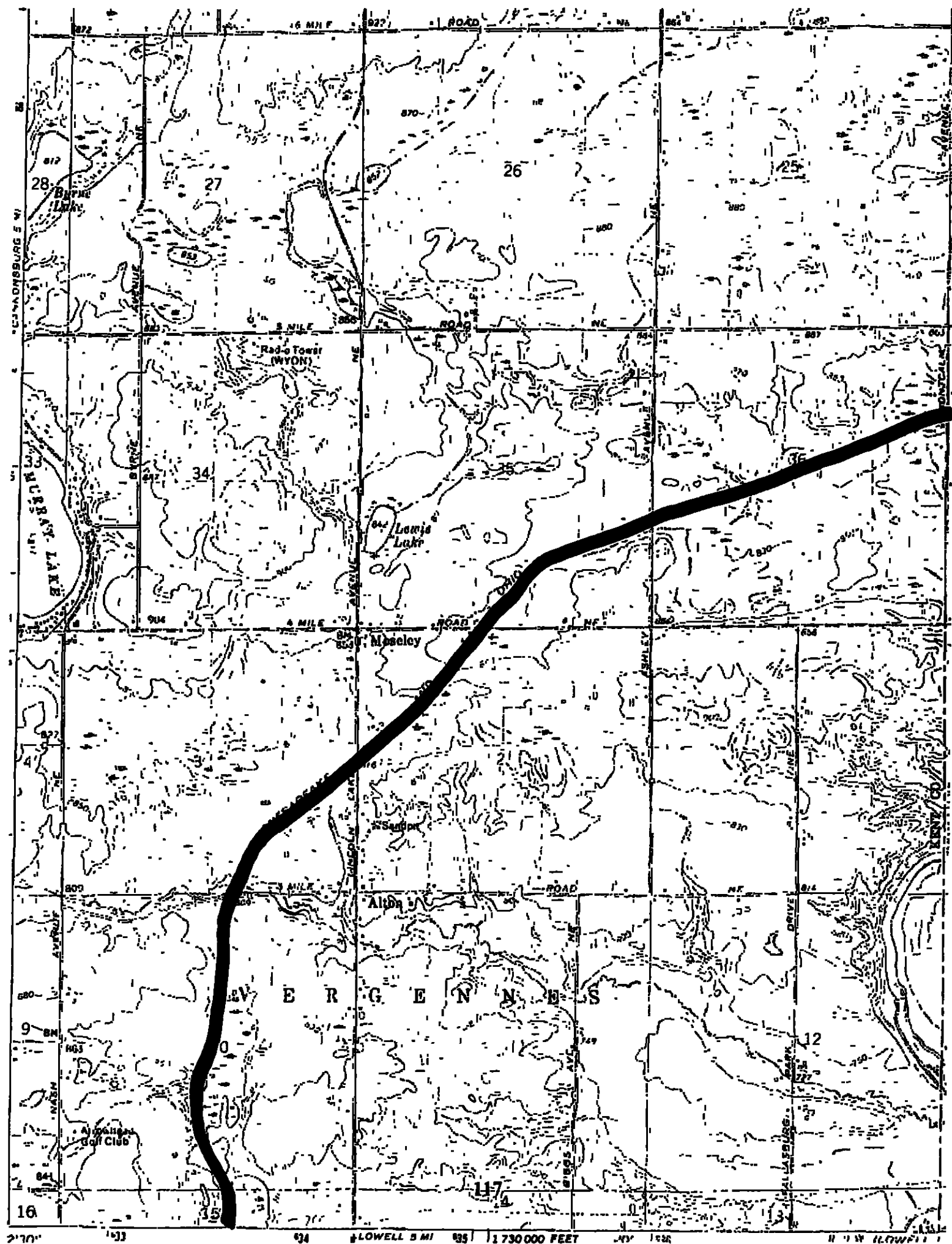
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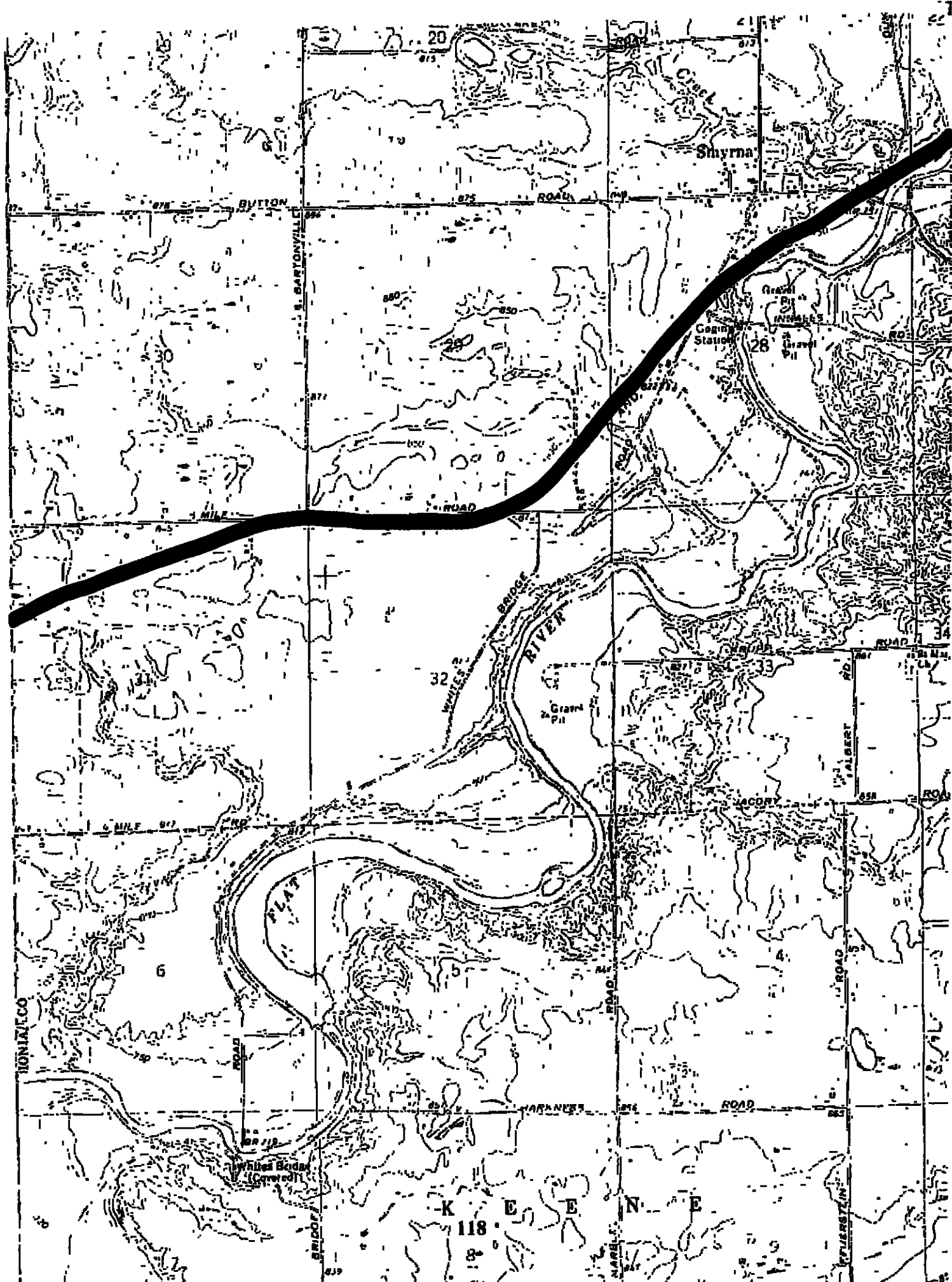


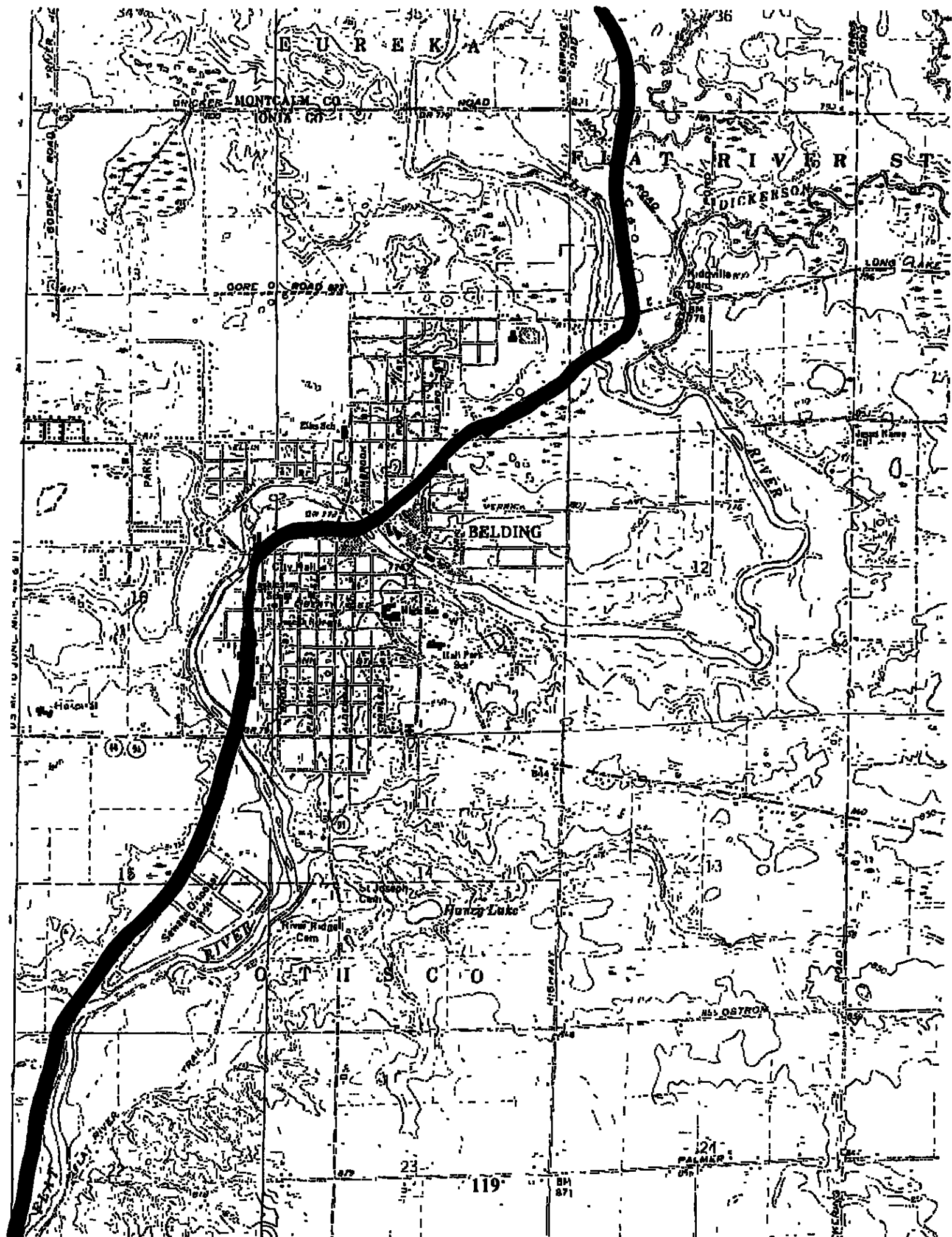
Mid-Michigan Railroad, Inc.
AB-364 (Sub-No. 14X)
Abandonment Exemption
Kent, Ionia, and Montcalm Counties, MI

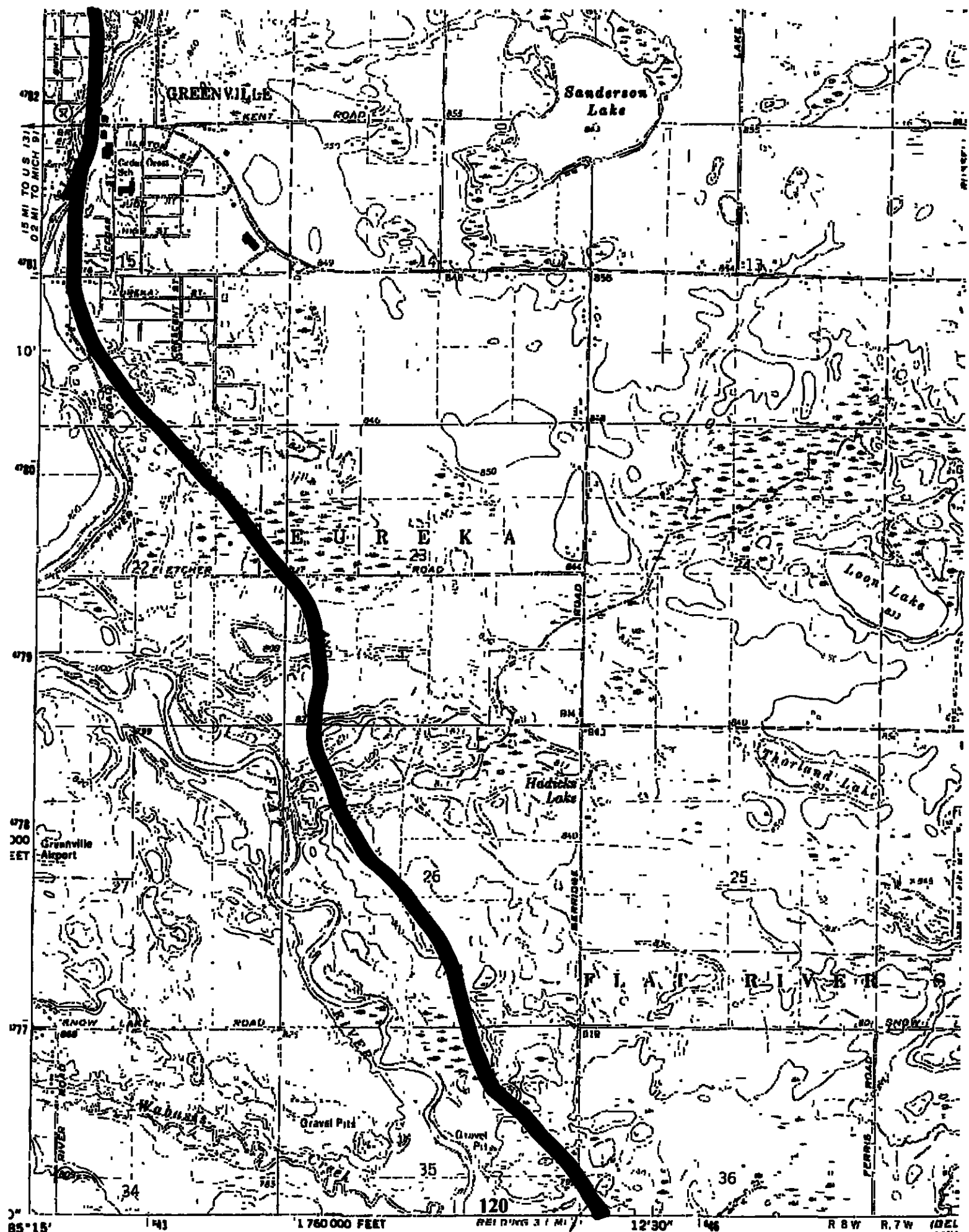


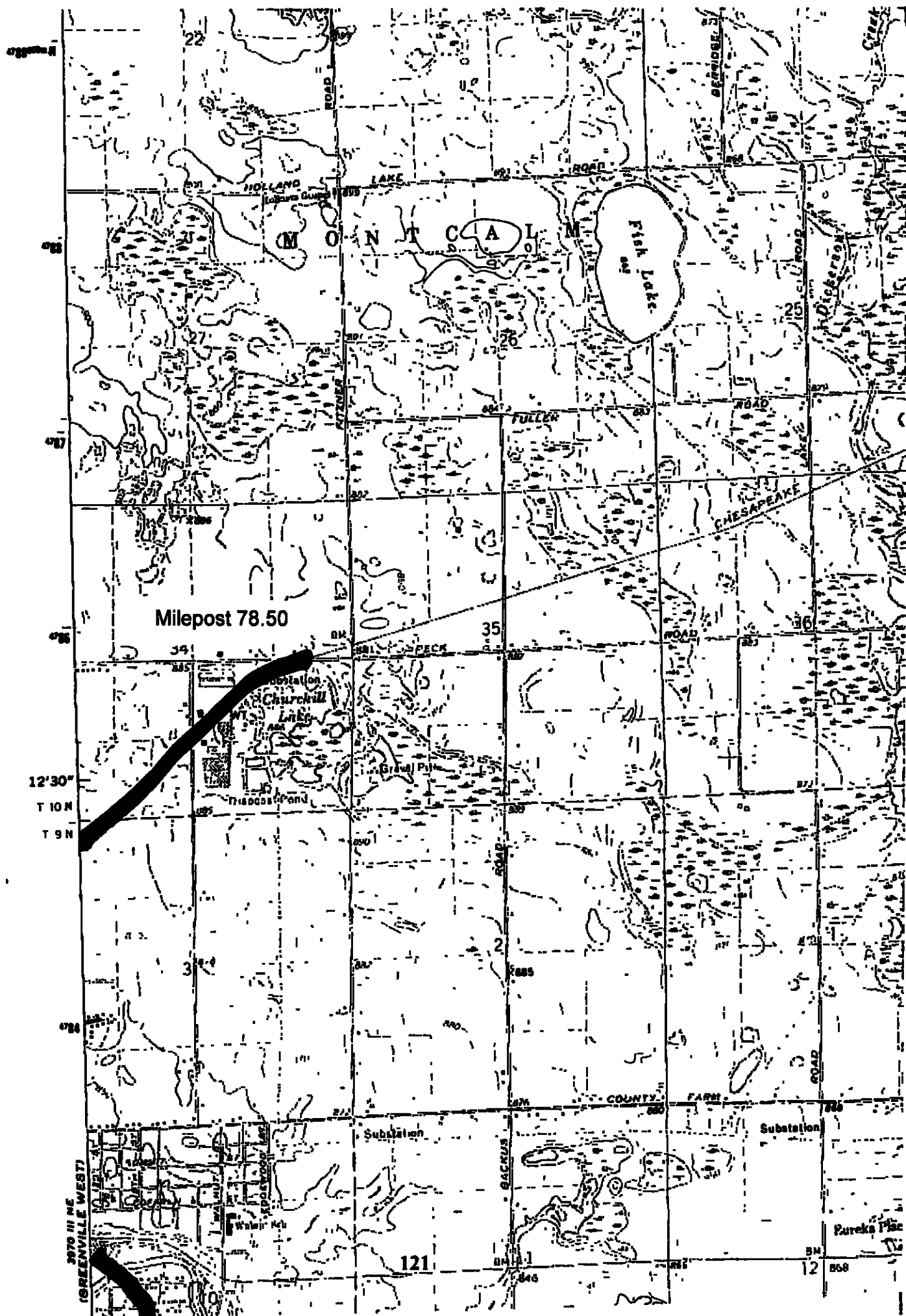
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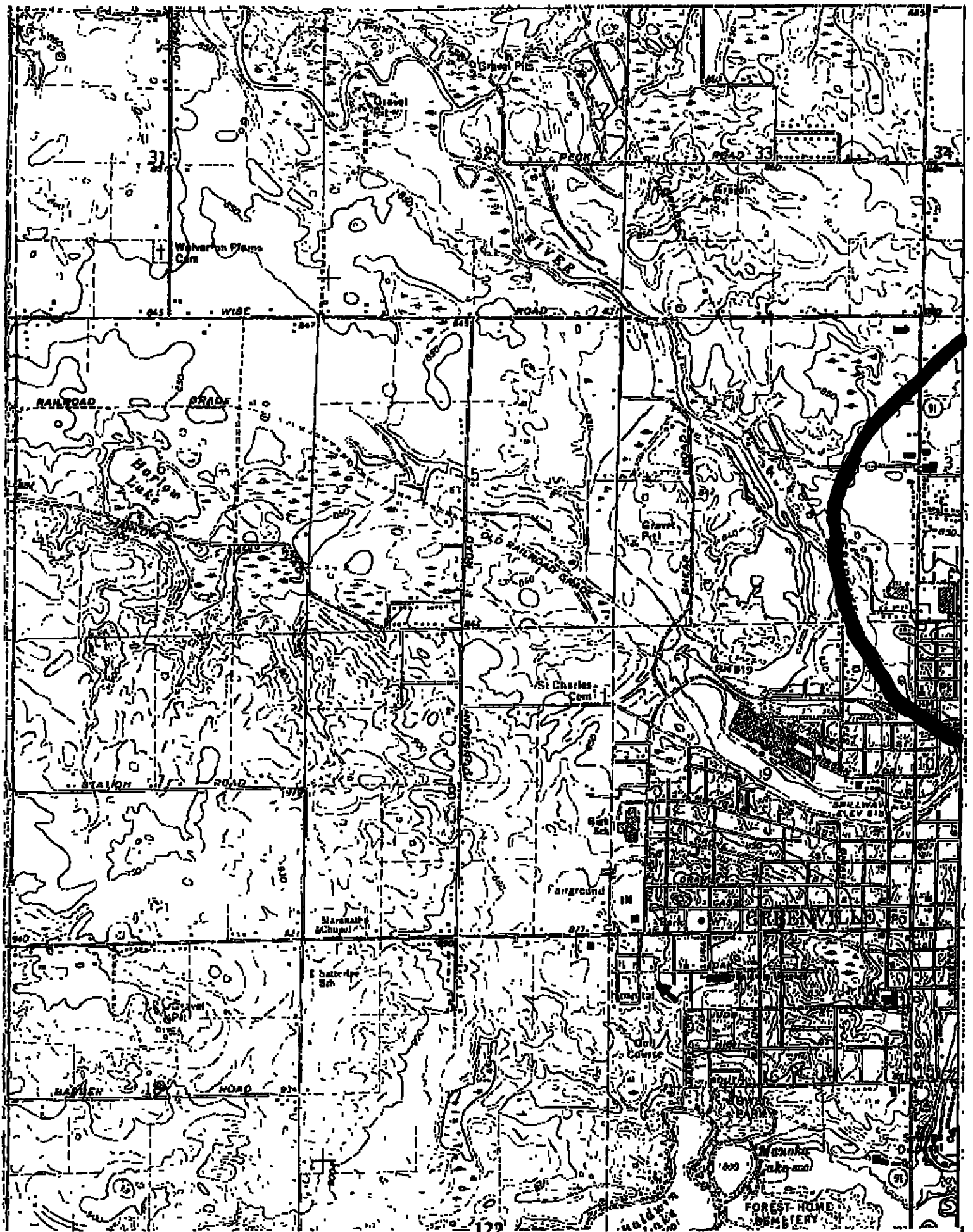




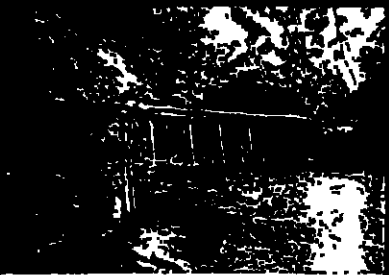








Greenville 81.10

		Bridge Inspection Report Mid-Michigan Railway Greenville Michigan				
		Inspected By: Stan Reimer Inspection Date: May 22, 2006				
DELCAN						
Timber Trestle Structure						
Structure	PT	Deck Typ	Ballast	Crossing	River	
# Spans	13	Length	175	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	1943	Alignment	C			
Greenville 81.10 Flat River						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers		Poor	
Channel/Road		Poor	Floor Beams			
Approach		Fair	Girders/Truss/Slab			
Deck		G/F/P/B	Top Flange		Misc	
Ties		Fair	Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track		Fair	Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
					Overall Rating: Poor	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P11-P12	- Bent 11 cap crushing - urgent replacement still required					
P10	- Bent 8 - piles 2 and 6 punky - other piles sound OK					
	Delcan 2005 Notes:					
P01	- Approaches low					
P06-P09	- Bent 11 - urgent pile cap replacement from last year not yet done - cap crushing					
	- Bent 7 - piles 2 and 3 punky, pile 4 OK					
	- Bent 8 - piles 2 and 6 punky (piles 4 and 5 seem to be OK)					
	Delcan 2004 Notes:					
P01	- Approaches uneven					
P03	- Ballast deck ties OK					
P04	- Inspected under traffic - no pumping evident near first approach					
	- Bent 6 - pile 4 hollow, pile 6 OK					
	- Bent 7 - pile 2 hollow, pile 6 OK					
	- Bent 8 - piles 2, 4 and 5 are punky near waterline					
	- Bent 9 - pile 6 punky near waterline					
	- Bent 10 - pile 4 is punky near waterline					
P09	- Bent 11 - pile cap crushed - urgent replacement required					
P02	- Debris in channel on right					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
Urgent	Replace pile cap on bent 11 - \$5,000					
3 years	Post bent 8 - piles 2 and 6 - \$5,000					
5 years	Post bents - \$20,000					
	Banding program for bent 14 pile cap					

**Mid-Michigan Railway
Greenville
Michigan**

May 22, 2006

DELCAN

Structure	DPG	Deck Typ	Open	Crossing	Stream
# Spans	2	Length	100	Access	< 1/2 mile
# Tracks	1	Height		Flow Dir	R - L
Year Built	1910	Alignment	T		

Greenville 81.60 Stream

General	G/F/P/B	Superstructure	G/F/P/B	Substructure	G/F/P/B
Scour	Fair	Stringers		Bridge Seats/Caps	Fair
Channel/Road	Fair	Floor Beams	Fair	Abuts/Backwalls	Poor
Approach	Fair	Girders/Truss/Slab	Fair	Piers, Towers, Bents	Poor
Deck	G/F/P/B	Top Flange	Fair	Misc	G/F/P/B
Ties (Open Deck)	Fair	Bottom Flange	Fair	Guard Rail	
Tie Spacers	Fair	Web/Diagonals	Fair		
Track	Fair	Bearing Stiffeners	Fair		
Footwalk		Bracing	Fair		
Handrail		Bearngs	Fair	Overall Rating:	Fair

Photo #	Remarks
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P01	- First approach a bit low this year
-----	--------------------------------------

P03 - Open deck - 12 reject ties this year

P09	- Pier 1 - right side - monitoring cracking - OK for now
-----	--

- Approaches OK

- 6/99 reject ties (6%)

Delcan 2004 Notes:

P01 - Approaches a bit low

P03	- 5/99 reject ties (5%)
-----	-------------------------

P12,P06	- Pier 1 - crack below right bearing on upmile face only - monitor
----------------	---

P08	- Abutment 1 - right bearing seat - some cracking at previous repair - monitor
-----	--

UMA 2003 Notes:

12/99 ties poor. Extensive delamination of abutment 1 concrete. Backwall is horizontally cracked 1/2" in 2 locations. Pier 1 concrete is scaling. Plan on concrete repairs to pier and abutment #1.

Urgency	Description
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Monitor	Crack on upmileage face of Pier 1
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**Mid-Michigan Railway
Greenville
Michigan**

DELCAN

May 22, 2006

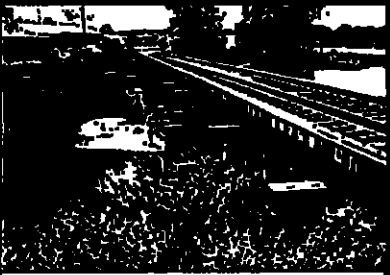
Greenville 87.4 Flat River

COMMENTS

MAINTENANCE RECOMMENDATIONS

[illegible]

Greenville 88.20

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By: Stan Reimer		Inspection Date: May 22, 2006		DELCAN		
Steel Structure (Girders/Beams)						
Structure	Steel Trestle	Deck Typ	Ballast	Crossing	River	
# Spans	17	Length	225	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	1918	Alignment	C			
Greenville 88.20 Flat River						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour Channel/Road Approach		Fair	Stringers		Good	
		Fair	Floor Beams			
		Fair	Girders/Truss/Slab			
Deck		G/F/P/B	Top Flange			
Ties (Open Deck)		Good	Bottom Flange			
Tie Spacers		Good	Web/Diagonals			
Track		Good	Bearing Stiffeners			
Footwalk			Bracing		Fair	
Handrail			Bearings			
Substructure		G/F/P/B	Bridge Seats/Caps		Fair	
			Abuts/Backwalls		Fair	
			Piers, Towers, Bents		Fair	
			Misc		G/F/P/B	
			Guard Rail			
			Overall Rating:		Fair	
COMMENTS						
Photo #	Remarks					
P01-P03	Delcan 2006 Notes: - No change in condition since 2005 - Since major repairs were relatively recent, detailed inspection of piles not yet reqd					
P01	Delcan 2005 Notes:					
P06	- No changes since 2004 inspection					
P05, P07	Delcan 2004 Notes:					
P02	- Approaches OK					
	- Steel frame bents installed on cut timber piles - sill plates at varying elevations					
	- Bents 4 and 16 not replaced after fire					
	- Open deck - all ties are new and in good condition					
	UMA 2003 Notes:					
	This bridge was burned down 2 years ago and repaired by steel frame bents and steel stringers. New deck. All fair. No action required					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 89.30

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
Timber Trestle Structure with Steel Mainspan(s)						
Structure	PT/Beam	Deck Typ	Open	Crossing	River	
# Spans	17	Length	277	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			
Greenville 89.30 Flat River						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour Channel/Road Approach		Fair	Stringers		Poor	
		Fair	Floor Beams			
		Fair	Girders/Truss/Slab			
Deck		G/F/P/B	Top Flange		Misc	
Ties (Open Deck)		Fair	Bottom Flange		Guard Rail	
Tie Spacers		Fair	Web/Diagonals			
Track		Fair	Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
Overall Rating:					Poor	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P08	- Span 1 sinkhole in ballast deck					
P06	- Stringer 1 in span 1 - recently replaced - new stringer width is less					
P11,P12	- Timber sill plates of bents 12 and 13 are on concrete slabs so not as urgent					
	Delcan 2005 Notes:					
P02	- Bent 3 cap replaced					
P03	- Span 1 - stringer 1 replaced					
P12	- Stringer 1 crushing over bent 16 (not bent 18)					
	Delcan 2004 Notes:					
P01	- Approaches a bit low					
P03	- 0/28 reject ties (0%) for beam span					
P22,P23	- Ballast deck ties poor					
P04	- Sinkhole through ballast trough floor near bent 2					
P05,P06	- Span 1 - stringer 1 crushing and rotating out at bent 1 - to be replaced					
P09,P10	- Bent 3 pile cap crushing - urgent replacement					
P11	- Most bents are steel pipe piles with concrete pile caps - debris in river on right					
P12	- Stringer 2 from bents 3 to 5 - end rot					
P13	- Bent 5 - timber blocking on concrete caps is rotting					
P14	- Bent 13 - timber sill plate rotten and to be replaced					
P15	- Bent 14 - timber sill plate rotten and to be replaced					
P16,P17	- Bent 14 - pile cap starting to rot, post 4 is rotten and hollow					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
1 year	Replace stringer 1 over bent 16 - \$5,000					
3 years	Replace sill plates for bents 13 and 14 - \$10,000					
3 years	Replace pile caps for bents 1, 14 and 15 - \$15,000					

Greenville 89.31

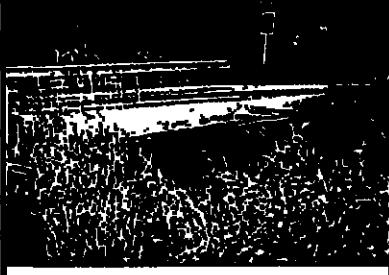
		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
O/H Highway Structure						
Structure	O/H Via	Deck Typ	-	Crossing	Hwy	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour	Fair	Stringers			Bridge Seats/Caps	
Channel/Road	Good	Floor Beams			Abuts/Backwalls	
Approach	Fair	Girders/Truss/Slab		Good	Piers, Towers, Bents	
Deck	G/F/P/B	Top Flange			Misc	
Ties (Open Deck)		Bottom Flange			Guard Rail	
Tie Spacers		Web/Diagonals				
Track		Bearing Stiffeners				
Footwalk	Good	Bracing				
Handrail		Bearings				
				Overall Rating:	Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes: - No change in condition since 2005					
	Delcan 2005 Notes: - No change in condition since 2004					
	Delcan 2004 Notes: - Concrete deck on steel girders					
P01	UMA 2003 Notes: - Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					

Greenville 91.60

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By: Stan Reimer		Inspection Date: May 22, 2006				
Timber Trestle Structure						
Structure	PT	Deck Typ	Ballast	Crossing	Stream	
# Spans	6	Length	82	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour	Fair	Stringers	Fair	Bridge Seats/Caps	Poor	
Channel/Road	Fair	Floor Beams		Abuts/Backwalls	Fair	
Approach	Fair	Girders/Truss/Slab		Piers, Towers, Bents	Bad	
Deck		G/F/P/B	Top Flange		Misc	
Ties	Fair	Bottom Flange		Guard Rail		
Tie Spacers		Web/Diagonals				
Track	Fair	Bearing Stiffners				
Footwalk		Bracing	Fair			
Handrail		Bearings				
Overall Rating:					Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
	- this bridge has <u>urgent work that has not been done</u>					
P04	- Bent 1 - stumps 1 and 5 are rotten					
P05	- Bent 2 - piles 3 and 4 are posted, piles 1, 5 and 6 are rotten - <u>urgent repair reqd</u>					
P08	- Bent 4 - piles 1, 2, 3 and 6 are reject - <u>needs framing too</u>					
P09,P10	- Bent 7 pile cap is rotten on left					
	Delcan 2005 Notes:					
P03	- Bent 1 - stump 4 is rotten					
P04	- Bent 2 - piles 1, 2, 5 and 6 are rotten - <u>frame bent now</u>					
P07	- Bent 5 - pile 1 is gone, piles 2, 3 and 4 are punky					
P09-P10	- Bent 7 - pile cap rotten					
	Delcan 2004 Notes:					
P01	- Approaches OK					
	- Ballast deck ties OK					
P06	- Bent 2 - piles 1, 2 and 5 are hollow, piles 3 and 4 are posted					
P07	- Bent 3 - Pile 4 completely hollow					
P08,P10	- Bent 4 - pile 3 is rotten near waterline, pile 2 is punky					
P11	- Bent 5 - pile 1 is crushed, others sound punky - <u>frame within 1 year</u>					
P16,P18	- Bent 6 - pile cap split and to be banded, post 1 split and to be banded					
P15	- Bent 7 - pile cap is split on right					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
Urgent	Frame bents 2, 4 and 5 - \$30,000					
1 year	Post bent 3 - pile 4, bent 4 - pile 3 - \$10,000					
1 year	Replace bent 7 pile cap - \$5,000					
	Banding Program - Bent 6 - cap and post 1					
	Consider replacement with culvert for \$35,000					

[illegible]

Greenville 94.70

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
Steel Structure (Girders/Beams)						
Structure	Iron Bridge	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir		
Year Built	?	Alignment	T			
Greenville 94.70 Road Bridge						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour			Stringers			
Channel/Road			Floor Beams			
Approach			Girders/Truss/Slab			
Deck		G/F/P/B	Top Flange			
Ties (Open Deck)			Bottom Flange			
Tie Spacers			Web/Diagonals			
Track			Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
			Bridge Seats/Caps			
			Abuts/Backwalls			
			Piers, Towers, Bents			
			Misc		G/F/P/B	
			Guard Rail			
Overall Rating:					Poor	
COMMENTS						
Photo #	Remarks					
P03	Delcan 2006 Notes: - Timber bearing blocks for rail stringers are rotting at ends - OK for now					
	Delcan 2005 Notes: - No change in condition since 2004					
	Delcan 2004 Notes: - This is a road bridge adjacent to and crossing the tracks					
P01						
P04	- Superstructure is steel rails on top of timber abutments, timber deck - Consider closing this bridge or turning it over to road agency - Otherwise, consider replacing with a culvert when bridge starts to fail					
P01	- Bridge is posted for 15 tons					
	UMA 2003 Notes: - Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

**Mid-Michigan Railway
Greenville
Michigan**

DELCAN

May 22, 2006

Structure	PT	Deck Typ	Ballast	Crossing	Stream
# Spans	1	Length	13	Access	< 1/2 mile
# Tracks	1	Height		Flow Dir	R - L
Year Built	1929	Alignment	T		

Greenville 95.50
Cattle Pass

General	G/F/P/B	Superstructure	G/F/P/B	Substructure	G/F/P/B
Scour	Fair	Stringers	Poor	Bridge Seats/Caps	Fair
Channel/Road	Fair	Floor Beams		Abuts/Backwalls	Fair
Approach	Fair	Girders/Truss/Slab		Piers, Towers, Bents	Poor
Deck	G/F/P/B	Top Flange		Misc	G/F/P/B
Ties	Fair	Bottom Flange		Guard Rail	
Tie Spacers		Web/Diagonals			
Track	Fair	Bearing Stiffeners			
Footwalk		Bracing			
Handrail		Bearings		Overall Rating:	Poor

Photo #	Remarks
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	Delcan 2006 Notes:
P05	- Stringer 5 rotten at bent 1
P06	- Bent 1 cap rotten on left
	- Bent 1 piles 2 and 4 are rotten, pile 3 is posted
	Delcan 2005 Notes:
P08	- Stringer 5 is rotten
P03-P04	- Bent 1 pile cap rotten
P05	- Bent 1 - piles 2 and 4 are hollow
	Delcan 2004 Notes:
P01	- Approaches OK
P03	- Ballast deck ties OK
P06	- Bent 1 - piles 2 and 4 hollow
P04,P07	- Bent 1 cap starting to rot on left
	UMA 2003 Notes:
	Bent 2 was replaced with a frame bent. Bent 1 cap 1 is rotted on left side. 9-8x16 stringers. Piles 2 & 4 are hollow at top. Pile 3 is posted. Bent 1 needs to be framed within 3 years.

Urgency	Description
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[illegible]

**Mid-Michigan Railway
Greenville
Michigan**

Stan Reimer

May 22, 2006

DELCAN

Culvert

Structure	6' x 8' RCB	Deck Typ	-	Crossing	Stream
# Spans	0	Length	0	Access	< 1/2 mile
# Tracks	1	Height		Flow Dir	R - L
Year Built	?	Alignment	C		

Greenville 98.00
Culvert

General	G/F/P/B	Superstructure	G/F/P/B	Substructure	G/F/P/B
Scour	Fair	Stringers		Bridge Seats/Caps	
Channel/Road	Fair	Floor Beams		Abuts/Backwalls	Fair
Approach	Fair	Girders/Truss/Slab	Fair	Piers, Towers, Bents	
Deck	G/F/P/B	Top Flange		Misc	G/F/P/B
Ties (Open Deck)		Bottom Flange		Guard Rail	
Tie Spacers		Web/Diagonals			
Track	Fair	Bearing Stiffeners			
Footwalk		Bracing			
Handrail		Bearings		Overall Rating:	Fair

COMMENTS

Photo #	Remarks
	Delcan 2006 Notes:
P01-P04	- No change in condition since 2005
	- Overgrown with brush
	Delcan 2005 Notes:
	- No change in condition since 2004
	Delcan 2004 Notes:
P01	- Approaches OK
P02	- Some spalling in headwall of outlet on left
	UMA 2003 Notes:
	- Not Inspected

MAINTENANCE RECOMMENDATIONS

[illegible]

**Mid-Michigan Railway
Greenville
Michigan**

DELCAN

Structure	PT	Deck Typ.	Ballast	Crossing	Stream
# Spans	1	Length	13	Access	< 1/2 mile
# Tracks	1	Height		Flow Dir	R - L
Year Built	1929	Alignment	T		

Greenville 99.50
Cattle Pass

General	G/F/P/B	Superstructure	G/F/P/B	Substructure	G/F/P/B
Scour Channel/Road Approach	Fair	Stringers	Fair	Bridge Seats/Caps	Fair
	Fair	Floor Beams		Abuts/Backwalls	Fair
	Fair	Girders/Truss/Slab		Piers, Towers, Bents	Poor
Deck	G/F/P/B	Top Flange		Misc	G/F/P/B
Ties	Fair	Bottom Flange		Guard Rail	
Tie Spacers		Web/Diagonals			
Track	Fair	Bearing Stiffners			
Footwalk		Bracing			
Handrail		Bearings		Overall Rating:	Fair

Photo #	Remarks
	Delcan 2006 Notes:
P01-P05	- No change in condition since 2005
	Delcan 2005 Notes:
	- No change in condition since 2004
	Delcan 2004 Notes:
P01	- Approaches OK
P03	- Ballast deck ties OK
P06	- Bent 2 - pile 3 split and to be banded
	UMA 2003 Notes:
	9-8x16 stringers. Bent 2 pile 1 needs to be on plan to post. Both caps are fair.
	Ballast curbs are tipping.

[illegible]

Greenville 99.60

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By: Stan Reimer		DELCAN				
Inspection Date: May 22, 2006						
Timber Trestle Structure						
Structure	PT	Deck Typ	Ballast	Crossing	Stream	
# Spans	1	Length	13	Access.	< 1/2 mile	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	1929/50	Alignment	T			
Greenville 99.60 Cattle Pass						
General		G/F/P/B	Superstructure		G/F/P/B	
Scour Channel/Road Approach		Fair	Stringers		Poor	
		Fair	Floor Beams			
		Fair	Girders/Truss/Slab			
Deck		G/F/P/B	Top Flange		Misc	
Ties		Fair	Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track		Fair	Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
Overall Rating: Poor						
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P04,P06 P05	- Stringer 1 is hollow and stringer 9 sounds punky - other stringers are OK - Bent 1 - piles 1, 2, 4 and 5 are hollow and/or rotten - needs framing					
	Delcan 2005 Notes:					
P05,P06 P04	- Stringer 1 and 9 are rotten - Bent 2 - piles 1, 2, 4 and 5 are hollow					
	Delcan 2004 Notes:					
P01	- Approaches OK					
P02	- Ballast deck ties OK					
P04	- Bent 2 - pile 5 hollow					
P05	- Bent 1 - pile 4 punky					
P06,P07	- Stringers discolored, stringer 9 starting to rot					
	UMA 2003 Notes:					
	Bent 1 pile 4 is hollow. Bent 2 pile 1 is bad; 2, 4 & 5 are hollow; 3 is fair; 6 is solid.					
	Stringer 9 is hollow. Bent 2 needs to be framed within 1 year.					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
1 year	Frame bent 2 - \$10,000					
3 years	Replace 2 stringers - \$10,000					

Greenville 99.85

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
Culvert						
Structure	CMP	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour		Fair	Stringers		Bridge Seats/Caps	
Channel/Road		Fair	Floor Beams		Abuts/Backwalls	
Approach		Fair	Girders/Truss/Slab		Piers, Towers, Bents	
Deck		G/F/P/B	Top Flange		Misc	
Ties (Open Deck)			Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track		Fair	Bearing Stiffners			
Footwalk			Bracing			
Handrail			Bearings			
Overall Rating:					Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes: - No change in condition since 2005					
	Delcan 2005 Notes: - No change in condition since 2004					
	Delcan 2004 Notes: - Approaches OK - Pipe culvert					
P01	UMA 2003 Notes: - Not inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer				
Inspection Date:		May 22, 2006				
Culvert						
Structure	CMP	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	Road	
# Tracks	1	Height		Flow Dir	R - L	
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure		G/F/P/B	
Scour	Fair		Stringers			
Channel/Road	Fair		Floor Beams			
Approach	Fair		Girders/Truss/Slab		Fair	
Deck	G/F/P/B		Top Flange			
Ties (Open Deck)			Bottom Flange			
Tie Spacers			Web/Diagonals			
Track	Fair		Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearings			
			Substructure		G/F/P/B	
			Bridge Seats/Caps			
			Abuts/Backwalls		Fair	
			Piers, Towers, Bents			
			Misc		G/F/P/B	
			Guard Rail			
			Overall Rating:		Fair	
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes: - No change in condition since 2005					
	Delcan 2005 Notes: - No change in condition since 2004					
	Delcan 2004 Notes: - Approaches OK - Pipe culvert					
P01	UMA 2003 Notes: - Not Inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					

Greenville 103.00

		Bridge Inspection Report				
		Mid-Michigan Railway Greenville Michigan				
Inspected By:		Stan Reimer		DELCAN		
Inspection Date:		May 22, 2006				
Culvert						
Structure	CMP	Deck Typ	-	Crossing	Stream	
# Spans	0	Length	0	Access	< 1/2 mile	
# Tracks	1	Height		Flow Dir	L - R	
Year Built	?	Alignment	T			
General		G/F/P/B	Superstructure	G/F/P/B	Substructure	
Scour	Fair		Stringers		Bridge Seats/Caps	
Channel/Road	Fair		Floor Beams		Abuts/Backwalls	
Approach	Fair		Girders/Truss/Slab	Fair	Piers, Towers, Bents	
Deck	G/F/P/B		Top Flange		Misc	
Ties (Open Deck)			Bottom Flange		Guard Rail	
Tie Spacers			Web/Diagonals			
Track	Fair		Bearing Stiffeners			
Footwalk			Bracing			
Handrail			Bearngs			
Overall Rating: Fair						
COMMENTS						
Photo #	Remarks					
	Delcan 2006 Notes:					
P01-P04	- No change in condition since 2005					
	Delcan 2005 Notes:					
	- No change in condition since 2004					
	Delcan 2004 Notes:					
P01	- Approaches OK					
	- Twin pipes					
	UMA 2003 Notes:					
	- Not Inspected					
MAINTENANCE RECOMMENDATIONS						
Urgency	Description					
	No action necessary					